

## 3.4 LOCAL AGENCIES



# N·C·S·D

Northstar Community Services District  
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*Board of Directors*  
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*General Manager*  
MICHAEL STAUDENMAYER

LA1

December 22, 2015

Attn: Stacy Wydra  
Placer County Community Development Resource Agency  
Environmental Coordination Services  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
[cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

Re: Martis Valley West Parcel Specific Plan Project – Draft Environmental Impact Report Comment Letter

Ms. Wydra,

Thank you for the opportunity to review the above mentioned Draft EIR. The following are the District's comments for consideration with the final draft of this document.

1. Timing and terms of construction of water and sewer infrastructure necessary to serve the Project are to be developed and memorialized in a development/facilities agreement between the District and Developer. LA1-1
2. Water and sewer infrastructure specified in the EIR will require further analysis and design development and are subject to amendment to meet the specific needs of the Project and District requirements. LA1-2
3. On-site aquifer yields are to be verified upon development and testing of production wells. LA1-3
4. The proposed Martis Valley Trail is to be incorporated into the Project design with appropriate connectivity with planned internal trails. LA1-4

Sincerely,

  
Eric Martin  
District Engineer

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**LA1**

**Northstar Community Services District  
Eric Martin, District Engineer  
December 22, 2015**

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LA1-1

The comment states that the timing and terms of construction of water and sewer infrastructure for the project are to be developed and memorialized in a development/facilities agreement between the District and the developer. The comment is acknowledged.

LA1-2

The comment states that water and sewer infrastructure will require further analysis and design development and are subject to amendment to meet the specific needs of the project and District requirements. The comment is acknowledged.

LA1-3

The comment states that onsite aquifer yields are to be verified upon development and testing of production wells. As discussed on page 16-18 of the Draft EIR, test wells have provided preliminary pumping test results from which to gauge the feasibility of onsite well development and municipal water supply and for purposes of environmental review. These wells indicate that some or all water demand could be met using onsite wells. However, as indicated in the comment, additional testing would be needed to determine specific well yields. If the onsite wells do not yield enough water to fully supply the project, the shortfall would be provided through connection to existing and planned NCSD supplies. As stated on page 16-22 of the Draft EIR, the Water Supply Assessment concluded that NCSD has sufficient and available supplies to meet its current and future demands and the project demands.

In order to clarify the process for use of onsite wells, the following text is added after the fifth sentence in the first paragraph under Impact 16-1 on page 16-18 (following “....and appropriate permits obtained.”):

Specific well yields will be defined when actual production wells are constructed and pumping tests of the production wells have been completed.

LA1-4

The comment states that the Martis Valley Trail (MVT) is to be incorporated into the project design with appropriate connectivity with planned internal trails. Policy OS-4 of the MVWSP requires that the applicant work with NCSD and other organizations involved in trail development to identify appropriate connections from internal trails to regional trails, such as the MVT. As shown in Exhibit 17-1 of the Draft EIR, there are several points where existing trails within the plan area can connect to the MVT. These connections would be retained, or modified as necessary to accommodate trail development within the plan area. The ultimate location of the connections would be determined in consultation with NCSD as required by Policy OS-4.



# N·C·S·D

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**Northstar Community Services District**  
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## Board of Directors

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**LA2**

## Fire Chief

MARK SHADOWENS

December 18, 2015

Placer County Community Development Resource Agency  
 Environmental Coordination Services  
 3091 County Center Drive Suite 190, Auburn CA 95603

Re: Comments to Martis Valley West Parcel Draft EIR

1. This comment references Cumulative Impact 18-8, cumulative exposure of people or structures to wildland fire hazards. Placer County policy PSU-25 requires that a Fire Protection Plan be prepared. A Fire Protection Plan based on Placer County policy requires the following items be incorporated into the plan.

1. Identification of emergency evacuation routes and emergency access road standards.
2. Standards for signs identifying evacuation routes.
3. Compliance with Northstar Community Service District fire flow requirements.
4. Defensible space measures.
5. Provides for fuels reduction zones.
6. Vegetation placement, maintenance, removal.
7. A program for disseminating public safety information.

LA2-1

Based on increased emergency response times associated with this proposed development and the overwhelming amount of hazardous forest fuels within the Martis Valley West Parcel additional mitigations should be required. It is required that an inclusive Forestry Management Plan be developed. The plan should include the following items and be completed by an independent third party under the direction of Northstar Fire Department.

1. The plan shall include detailed specifications for forest thinning of all lands within the Martis Valley West Parcel prior to any improvements.
2. The plan shall include detailed specifications for forest thinning within the wildland urban interface fuels reduction zones based on phasing of the development.
3. The plan shall include identified funding for future forest thinning maintenance of all areas within the Martis Valley West Parcel until one hundred percent of buildout is achieved.

LA2-2

Without this additional mitigation I believe that the cumulative exposure of people or structures to wildland fire hazards will be significant.

LA2-2  
cont.

2. Chapter 3, Project description page 3-24 states the following. "A second, seasonal EVA is proposed to connect to the Fibreboard Freeway (also commonly spelled Fiberboard Freeway), an existing paved, two-lane, east-west-trending road that lies south of the West Parcel and connects to SR 267 (Exhibit 3-9). This seasonal EVA would utilize an existing dirt logging road between the West parcel development area and Fibreboard; it would not be a new access route, nor would any road improvements be made". Exhibit 3-9 also shows several internal subdivision roads that are required as part of the emergency egress requirements for dead end roads. The draft EIR shows the roads as dirt roads.

LA2-3

All emergency access and egress roads that are required by local and State code or ordinance shall be paved all weather surfaces. Without this additional mitigation the cumulative exposure of people or structures to wildland hazards will be significant.

Sincerely



Mark Shadowens  
Fire Chief  
Northstar Fire Department



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**LA2**

**Northstar Fire Department, NCSD  
Mark Shadowens, Fire Chief  
December 18, 2015**

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**LA2-1**

The comment states that Placer County policy PSU-25 requires that a Fire Protection Plan (FPP) be prepared and lists requirements of the Plan. This information is included in Chapter 3, "Project Description," of the Draft EIR. Page 3-30 of the Draft EIR lists the required contents of the Fire Protection Plan and states the following:

Development projects within the MVWPSP would be required to consult with the NFD and Placer County Sheriff's Department during project design and preparation of the FPP to ensure that access for emergency vehicles is adequate and that project design promotes fire and public safety. The covenants, conditions, and restrictions (CC&Rs) for individual projects would mandate that property owners maintain adequate defensible space around structures and comply with other applicable measures contained in the FPP.

**LA2-2**

The comment states that additional mitigation is required, including preparation of a Forestry Management Plan that includes a number of items related to forest thinning. As discussed in Impact 18-4 as revised (see Chapter 2 of this Final EIR), a Fire Prevention Plan is being prepared for the MVWPSP and will require measures to address fuel maintenance within the Specific Plan area, including compliance with NCSD and State regulations regarding forest thinning on all lands and fuel reduction. These measures would also be subject to an agreement between NCSD and the applicant, because NCSD would provide fire protection services to the proposed project. Please also see Master Response 9 of this Final EIR addressing wildland fire hazards and emergency plans.

**LA2-3**

As discussed on page 3-24 of the Draft EIR, the project includes a primary EVA that would be paved for year-round use. This EVA would meet local and State requirements. Because the plan area would have two year-round, all weather access roads—the primary access road and the primary EVA—the secondary EVA is not required by local and state code or ordinance. Therefore, the secondary EVA, a seasonal road, connected to the Specific Plan area by existing dirt roads, is not subject to the requirements for a formal EVA. As required by existing codes, the required EVA would be paved, and the project would include internal access roads to the emergency EVA, which would also be paved (see Exhibit 3-9 in Chapter 3, "Project Description," of the Draft EIR). To clarify this, the text on page 3-24 of the Draft EIR is revised to read as follows:

**Emergency Access**

A year-round, ~~240~~-foot-wide, paved primary emergency vehicle access (EVA) road would be constructed through the 325-acre forest land, connecting to SR 267 at Brockway Summit, as shown on Exhibit 3-9. Both ends of the EVA would be gated (at the end of the Brockway parking area and at the edge of the West Parcel development) and the EVA would be used for emergency vehicles only, unless needed in a catastrophic event to also evacuate residents. Internal access roads (shown on Exhibit 3-9 of the Draft EIR) would be constructed as part of the proposed project and would be paved.

A second, seasonal EVA is proposed to connect to the Fibreboard Freeway (also commonly spelled "Fiberboard" Freeway), an existing paved, two-lane, east-west-trending road that lies south of the West Parcel and connects to SR 267 (Exhibit 3-9). This seasonal EVA would utilize an existing dirt logging road between the West Parcel development area and Fibreboard; it would not be a new access route, nor would any road improvements be made. The seasonal EVA would not be maintained or used for

emergency access in the winter season. Summer seasonal use of this secondary EVA would be limited to emergency vehicles and emergency provider mandated evacuation.



LA3

December 14, 2015

Placer County Community Development Resource Agency  
Environmental Coordination Services  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

Email: cdraecs@placer.ca.gov

**RE: NTPUD Comments: Martis Valley West Parcel Specific Plan Project** (State Clearinghouse No. 2014032087)

**Item 1:** Review of the above referenced project's Draft Environmental Impact Report (EIR) indicates development is not proposed within the Lake Tahoe Basin. Although this is stated in numerous locations throughout the body of the document, Attachment N: Water Supply Assessment (WSA), conflicts with this project description.

Quotes therein EIR Attachment N (WSA):

- "The 1,192-acre West Parcel has a development area of approximately 775 acres, of which 112.8 acres are located within the Lake Tahoe Basin" (memo pg. 1 of 17).
- "A portion of the project lies within the Tahoe Basin...as noted in TROA, developments within the Tahoe Basin must be served by water sources from within the Tahoe Basin. Accordingly, Project developments within the Tahoe Basin will be served by a to-be-determined source within the Tahoe Basin. This WSA specifically excludes water demands for development occurring within the Tahoe Basin...and recognizing that about 10% will actually be supplied by a water source within the Tahoe Basin." (memo pg. 8 of 17)

LA3-1

**NTPUD Comment 1 (relative to Item 1 above):** Please clarify if development is proposed, or not, within the Tahoe Basin. If, per WSA, development is proposed within basin, EIR shall analyze and review: proposed water demands, supply assessments, and supply source(s) for project elements proposed within Tahoe Basin.

**Item 2:** Review of the above referenced project's Draft EIR proposes a potential water supply source coming from the development of wells on the West Parcel. It is acknowledged that due to the nature of the West Parcel's subsurface geology this tapped aquifer would be more sensitive to extraction and is not currently well understood. The EIR further states if this source is ultimately proposed, it will be fully modeled to determine sustainable pumping rates able to support the project. In addition to a detailed model, if tapped, the surface and groundwater resources within the project area will be monitored to ensure sustainable extraction.

LA3-2

Quotes therein EIR Table 2-1:

- "A second option for water supply for the MWWPSP development would be the installation of groundwater wells on the West Parcel....they would penetrate moderate permeability volcanic rock aquifers more typical of mountainous terrain. These aquifers

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have limited storage capacity and are more sensitive to pumping and climatic fluctuations. The groundwater recharge rates and surface/groundwater interactions within the West Parcel, specifically, are not well understood."

- "The GSFLOW model uses a hydrologic framework specific to the Martis Valley, and shall be used to determine potential groundwater recharge rates for the West Parcel and to develop a calibrated water budget for the MVWPSP project."
- "The modeling results shall be used to estimate the quantity of groundwater that can be sustainably extracted from aquifers beneath the West Parcel."
- "The project applicant and NCSD shall develop a long-term monitoring program for the surface and groundwater resources within the West Parcel. The goal of the monitoring plan will be to detect and assess long-term changes and trends...and to provide reasonable assurance of long-term pumping at sustainable rates."

LA3-2  
cont.

**NTPUD Comment 2 (relative to Item 2 above):** Should this second option be explored further, the model shall fully address all ground and surface water areas which may be potentially affected by these new wells. These areas shall include all areas adjacent to the West Parcel (including those inside the Lake Tahoe basin) if potential affect determined so by the model. By pure definition, the meaning of "sustainable" includes that which can maintain its own viability without impacting outside (or adjacent) parties. The model shall indicate this is the case.

**NTPUD Comment 3 (relative to Item 2 above):** Regardless of model results, if this second option is exercised and results of the long-term monitoring plan exposes these wells are not extracting at a sustainable rate (and therefore are affecting outside areas), the production of these well shall be reduced as required to be within a sustainable amount. This requirement shall be included in the proposed development's Conditions, Covenants, and Restrictions (CC&Rs).

LA3-3

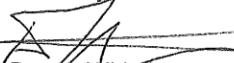
**Item 3:** Section 17.1.1 identifies North Tahoe Area Beaches and North Tahoe Regional Park as existing park and recreation amenities that will serve this development.

**NTPUD Comment 4 (relative to Item 3 above):** The discussion of Impact 17-1 finds no significant impact to existing recreational facilities, but provides no identification of how the project will mitigate impacts to Tahoe Beaches and North Tahoe Regional Park from the influx of users generated by this 760 unit residential development. The Final EIR should discuss how the Project will mitigate impacts specifically to North Tahoe Regional Park and North Tahoe Area Beaches.

LA3-4

Please feel free to contact me at any time if you have any questions on the above comments.

Sincerely,



Duane Whitelaw  
General Manager/Chief Executive Officer

DW/ws

**LA3**

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**North Tahoe Public Utility District  
Duane Whitelaw, General Manager, Chief Executive Officer  
December 14, 2015**

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**LA3-1**

The comment requests clarification as to whether the MVWPSP involves any development within the Lake Tahoe Basin. The MVWPSP does not propose development within the Lake Tahoe Basin. The language in the Water Supply Assessment reflects the timing of the original draft that addressed the 2014 Specific Plan, since revised, which included development in the Tahoe Basin. See Section 1.5.3, “Specific Plan Background,” of the Draft EIR, which states:

As part of the original MVWPSP prepared in 2014, a draft Area Plan was prepared for 112.8 acres of the West Parcel located within the Tahoe Basin watershed and therefore within the jurisdiction of the Tahoe Regional Planning Agency (TRPA). The Area Plan proposed to redesignate 112.8 acres of the West Parcel within the Basin to “Resort Recreation” under the TRPA Regional Plan, allowing up to 112 dwelling units on that portion of the site. In addition, 130 acres of Tahoe Basin land on the East Parcel were considered in the original MVWPSP.

A Notice of Preparation of a Draft Environmental Impact Report for Placer County and Environmental Impact Statement for TRPA (EIR/EIS) was published in March 2014. A draft Specific Plan was submitted to the County in May 2014; and a draft Area Plan was submitted to the County and TRPA in June 2014.

In response to input from agencies, organizations, and members of the public on the 2014 NOP and draft Specific Plan and Area Plan, the applicant revised the MVWPSP proposal to remove all Tahoe Basin lands from the West Parcel and East Parcel. The proposed West and East Parcels boundary is now coincident with the adopted Tahoe Basin boundary line, which is the boundary of TRPA jurisdiction. The revised MVWPSP does not propose any changes to lands within the Lake Tahoe Basin that fall under the jurisdiction of TRPA or its processes. As a result, an Area Plan is no longer part of the proposed MVWPSP, and no TRPA action will be required for the MVWPSP.

As documented in a revised NOP for Placer County, published February 27, 2015, the revised MVWPSP proposes the same number of dwelling units (760 units), associated homeowner amenities (22,000 square feet [sf]), and commercial square footage and acreage (34,500 sf and 6.6 acres) on the West Parcel, as well as conservation of the entire East Parcel, as originally proposed. However, all residential and associated recreational and commercial development on the West Parcel would occur outside of the Tahoe Basin within 662-acres to be redesignated from Forest to Residential. As proposed in the original MVWPSP, utility connections, the primary emergency access road, and trail connections could be located within the 390 acres of the West Parcel that would be designated Forest, again located outside of the Basin. Lastly, the 130 acres of East Parcel in Placer County within the Tahoe Basin remained as originally proposed to be conserved with the East Parcel.

**LA3-2**

The comment requests that, should groundwater wells be installed on the West Parcel, that modeling for such wells address all areas adjacent to the West Parcel. Mitigation Measure 15-4a requires the use of GSFLOW to confirm that onsite wells can provide water to the project in a sustainable manner. This model does not extend into the Tahoe Basin (because the watershed does not extend into the Basin), so it cannot be used to assess the effects on water sources within the Basin. However, Mitigation Measure 15-4b requires monitoring of surface and groundwater resources in the vicinity of project wells and sets operational goals to ensure that groundwater and surface water resources are not adversely affected. This

monitoring would address water resources that could be affected by onsite wells, regardless of whether the resources are located within the Martis Valley or the Tahoe Basin.

- LA3-3      The comment requests that, if monitoring demonstrates that onsite wells are not extracting at a sustainable rate, that the Conditions, Covenants, and Restrictions (CC&Rs) for the MVWPSP require that production from such wells be reduced to a sustainable level. Mitigation Measure 15-4b on pages 15-24 and 15-25 identifies performance goals for monitoring and states that NCSD would be responsible for adjusting the pumping distribution between onsite and offsite wells. Because NCSD would manage the water supply, and individual homeowners would not have control over well operation, there is no need to include this provision within the development's CC&Rs.
- LA3-4      The comment recommends mitigation for potential impacts to North Tahoe Regional Park and North Tahoe Area Beaches. As disclosed in Impact 17-1 of the Draft EIR, the MVWPSP would result in a permanent and seasonal population increase, which would result in an increase in use of existing recreation resources. To meet future demand for park and recreation facilities from development subsequent to the MVWPSP, the MVWPSP contains policies that require and plan for a number of private active recreation facilities that would be constructed on the West Parcel. The MVWPSP would also provide for passive recreation facilities through the construction of approximately 14 miles of multi-use trails and associated amenities such as trailheads, benches, and rest stops on the West Parcel. The project developer would be required to pay additional fees to Placer County in the event that these proposed facilities are not equivalent to Placer County standards and park fees. For these reasons, the physical deterioration of existing park facilities associated with increased demand for park and recreation facilities was determined to be less than significant. No significant impact was identified to North Tahoe area recreation facilities, which would continue to be supported by local taxes and revenue generated by parking fees and concessionaire contracts that provide additional revenue to take care of annual maintenance, restrooms, litter and trash removal, and other maintenance as needed. Therefore, no mitigation is required.

LA4

***NORTH TAHOE FIRE PROTECTION DISTRICT****Michael S. Schwartz, Fire Chief*

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December 18, 2015

Mr. Michael J. Johnson, AICP  
 Agency Director  
 Ms. Stacy Wydra, Project Planner  
 Placer County Community Development Resource Agency  
 Environmental Coordination Services  
 3091 County Center Drive, Suite 190  
 Auburn, CA 95603

**Re: Comments on Draft Environmental Impact Report (DEIR)  
 Martis Valley West Parcel Specific Plan (MVWPSP)**

Dear Mr. Johnson and Ms. Wydra:

Thank you for the opportunity to comment on the DEIR for the Martis Valley West Parcel Specific Plan. The Board of Directors of the North Tahoe Fire Protection District (NTFPD or "District") has not taken a position on the "Proposed Project" or any of the alternatives described and analyzed in the DEIR. The purpose of this letter is to convey our District's concerns with the traffic and Level of Service (LOS) impacts on California State Route 267 identified in the DEIR.

The North Tahoe Fire Protection District was formed in 1993, following the consolidation of the Tahoe City Fire Protection District (based in Tahoe City) and the North Tahoe Fire Protection District (based in Kings Beach). Our District's mission is *"to provide the best quality fire protection, fire prevention, fire safety education, emergency medical service, and other emergency response services to the citizens and visitors of the District."*

The District focused resources to review the MVWPSP DEIR, with particular attention to the Proposed Project Description (Section 3), Project Alternatives (Section 19), Public Services and Recreation (Section 17), and Transportation and Circulation (Section 10). It is in the Transportation and Circulation section where we found the issues of greatest concern to the NTFPD.

State Routes 267 and 89 are the only two highway routes that provide access in and out of North Lake Tahoe within Placer County. For our District and other emergency service providers that operate in the region, SR 267 and SR 89 serve as the primary transportation corridors to Tahoe Forest Hospital in Truckee and as primary evacuation routes from North Lake Tahoe to points north, west, and east of the Tahoe Basin in the event of a catastrophic wildfire or other major disaster.

LA4-1

Below, we have listed some of the statements within the Transportation and Circulation section that lead to our concerns about the increased congestion anticipated on SR 267 and related intersections should the Proposed Project be approved based on the DEIR as written:

#### **Section 10.3.4 Impacts and Mitigation Measures**

##### **Impact 10-1: Impacts to Intersection Operations (Page 10-27)**

"The proposed project would worsen already unacceptable operations (i.e., already beyond the acceptable threshold) at the SR 267/I-80 West Bound ramps, SR 267/Schaffer Mill Road/Truckee Airport Road and SR 267/Highlands View Road intersections during the winter peak hour. This would be a **significant impact**."

"During the winter peak hour, five of the study intersections would operate at acceptable levels of service, while the following three study intersections would degrade already unacceptable operations, as follows:

- SR 267/I-80 West Bound Ramps: LOS E to F (27-second increase in delay)
- SR 267/Schaffer Mill Road/Truckee Airport Road: LOS E to F (24-second increase in delay)
- SR 267 Highlands View Road: (LOS E to F (38-second increase in delay)."

##### **Under Significance after Mitigation (Page 10-28)**

"However, improvements on State facilities require approval from Caltrans. Placer County cannot guarantee that Caltrans would optimize signal timing; therefore, the impacts at the SR 267/I-80 West Bound ramps and SR 267/Schaffer Mill Road/Truckee Airport Road Intersections would be **significant and unavoidable**."

##### **Impact 10-2: Impacts to roadway segments (Page 10-29)**

"The proposed project would worsen traffic congestion on the five SR 267 segments between the Town of Truckee/Placer County Line and SR 28, resulting in a segment either degrading from acceptable LOS D to unacceptable LOS E, or exacerbating conditions on a segment operating at an unacceptable LOS E by an increase in V/C ratio (volume to capacity ratio) of 0.05 or more, for both summer and winter peak hours. This would be a **significant impact**."

##### **Under Significance after Mitigation (Page 10-31)**

"The widening of SR 267 to four lanes from the County line to Brockway Summit is included in the CIP (Placer County Tahoe Region Benefit District Capital Improvement Program). This improvement would result in acceptable levels of service under existing-plus-project conditions for the roadway segment from the Placer County Line to the Project Access Roadway. The estimated cost of this improvement is \$32.4 million, of which \$13.9 million is assumed to come from the State and \$18.5 million is assumed to come from County traffic impact fees."

"The Placer County CIP does not include the widening of SR 267 from Brockway Summit to SR 28; therefore, there would be no feasible mitigation for the significant impact of the project on the roadway segment from the Project Access Roadway to SR 28." (Underline emphasis added).

"The mitigation measure would ensure that the project pays its fair share fee to the Placer County Countywide Traffic Fee Program. Although the project would pay traffic fees for applicable CIP projects, including future widening of SR 267 to four lanes between Brockway Road and Brockway Summit, it is not feasible for the project itself to fund the SR 267 widening, and it is unlikely that the improvement would be constructed before the project is implemented. In addition, there is no feasible mitigation to improve the adversely affected roadway segment

LA4-2



from the Project Access Roadway to SR 28. Therefore, the project's impact on roadway segments would remain significant and unavoidable."

### 10.3.5 Cumulative Conditions

#### Cumulative Conditions Traffic Volume Forecasts

##### Under Cumulative Conditions Roadway Improvements (Page 10-37)

"The (Caltrans) *Transportation Corridor Concept Report, State Route 267* identifies future improvements to SR 267 including the extension of the existing southbound truck-climbing lane from Northstar Drive to Brockway Summit. The TCR also states the following: In order to meet the Concept LOS, the facility will ultimately need to be widened to four lanes."

"The Placer County CIP, discussed above, identifies the following intersection and roadway improvements needed in Placer County, including:

- Widening SR 267 to 4 lanes from the Town of Truckee line to Brockway Summit
- Intersection improvements at SR 267 and Schaffer Mille Road/Truckee Airport Road
- Intersection improvements at SR 267/Northstar Drive
- Intersection improvements at SR 267/SR 28 (underline emphasis added)

Note: NTFPD Station 52 (Kings Beach) is located near the SR 267/SR 28 intersection.

"The Town of Truckee Traffic Fee Impact Program (TIF) identifies the following intersection and roadway improvements needed in the Town of Truckee, including:

- SR 267/I-80 Westbound Ramps - Construct 2-lane roundabout
- SR 267/I-80 Eastbound Ramps -Construct 2-lane roundabout
- SR 267/Brockway Road - Construct roundabout or equivalent improvement
- SR 267 from Brockway Summit Road to the Town of Truckee/Placer County line - Widen to 4 lanes."

On page 10-39:

"Although these improvements are included in the Placer County CIP and the Town of Truckee TIF, they are owned and operated by Caltrans. There is no assurance Caltrans will make these improvements within the 2034 horizon year; therefore, the cumulative conditions analysis assumes that SR 267 remains in its 2-lane rural highway condition."

#### Under Cumulative Impact 10.9: Cumulative impacts to roadway segments (Page 10-43)

"As a two-lane highway, SR 267 would continue to operate at unacceptable levels of service on five of the seven study segments during the summer peak hour without the proposed project, and all seven segments would operate at unacceptable levels of service during the winter peak hour without the proposed project."

"For the two SR 267 segments located in the Town of Truckee, the project would result in a significant impact on the segment from Brockway Road to the Town of Truckee/Placer County line during the winter peak, as the project would increase the V/C ratio of 0.05 (an increase of 0.05 or more is considered significant)."

"For the five SR 267 roadway segments located in Placer County, the project would result in a significant impact at all five segments during both the summer and winter peak hours, in all cases because it would result in an increase in V/C ratio of 0.05 or greater than segments projected to operate unacceptably without the project. Therefore, the project's contribution to significant, cumulative roadway segment impacts **would be cumulatively considerable.**"

LA4-2  
cont.

**Additional Observations**

1. Should the projections related to "Residential Unit Split" (Second Homes vs. Full-Time Occupancy) increase on the side of full-Time occupancy), transportation and circulation impacts related to the project may change. Changes may include a worsening of LOS beyond current projections. For example, in addition to the impacts generated by a higher percentage of full-time residents, impacts identified as Peak Period Summer and Peak Period Winter may be elongated if more "second home" residents occupy their units during these peak periods (reference page 10-21).
2. The document does not include any detailed analysis of the potential impacts generated by the proposed development on Level of Service (LOS) or Vehicle Miles of Travel (VMT) within the Lake Tahoe Basin. This information should be prepared and provided as part of the EIR. It would certainly be of value to the North Tahoe Fire Protection District, as well we anticipate, for many other agencies and organizations throughout the North Lake Tahoe region. In the case of our District, it may impact the level of services and response we can provide to our residents and area visitors.
3. We respectfully request that our District be included in any planning or other discussions related to Fire and Life Safety, such as those described in Section 3 (Project Description) on pages 3-29 and 3-30 as well as Evacuation Route planning associated with the proposed development.

LA4-3

LA4-4

Again, returning to the subject of emergency preparedness planning and evacuation in times of emergency, we have attached the most recent **Emergency Preparedness and Evacuation Guide** published by the North Tahoe Fire Protection and the Meeks Bay Fire Protection District. **You will see SR 267 identified as Evacuation Route C.**

LA4-5

Please feel free to contact my office should you need any additional information or clarify related to the matters identified in this DEIR comment letter. Thank you in advance for your consideration and response.

Respectfully,



Michael S. Schwartz, Fire Chief

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**LA4**

**North Tahoe Fire Protection District  
Michael S. Schwartz, Fire Chief  
December 18, 2015**

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- LA4-1 The comment states that the NTFPD has not taken a position on the proposed project or any of the alternatives analyzed in the Draft EIR, notes that SR 267 and 89 are the only two highway routes that provide access in and out of North Lake Tahoe within Placer County, and expresses concerns about traffic impacts as it relates to emergency preparedness and evacuation. Traffic impacts are analyzed in Chapter 10 of the Draft EIR, recreation impacts in Chapter 17, alternatives in Chapter 19 and the project description in Chapter 3. Specific concerns of the commenter are addressed in the following responses.
- LA4-2 The comment quotes text from the Draft EIR related to Impact 10-1, Impact 10-2, Impact 10-9, and the description of cumulative conditions and forecasts, emphasizing portions of the significance conclusions. Please see responses to comments LA4-3 through LA4-5, below.
- LA4-3 The commenter questions the residential split between full-time and second home occupancy, noting that if the percentage of full-time homes were to increase, worsening of Level of Service (LOS) beyond what is identified in the Draft EIR may occur. See Master Response 5 for a discussion of the justification for the residential split.
- LA4-4 The comment suggests that the Draft EIR does not include project impacts within the Tahoe Basin regarding LOS or VMT. Please see Master Response 6 regarding VMT. The traffic analysis for the EIR included LOS information for SR 267 from the proposed project access road to the State Route 28 intersection, which is located in the Tahoe Basin. The LOS analysis also included the intersection of SR 267 and SR 28 within the Tahoe Basin.
- LA4-5 The comment requests that the District be included in any planning or other discussions related to Fire and Life Safety and notes the inclusion of the most recent Emergency Preparedness and Evacuation Guide. Please see Master Response 9, which addresses wildland fire hazards and emergency evacuation.



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Tom Christoff, Air Pollution Control Officer

LA5

December 22, 2015

Stacy Wydra, Environmental Coordination Services  
Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
SENT VIA: [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

**SUBJECT: MARTIS VALLEY WEST PARCEL SPECIFIC PLAN PROJECT, DEIR**

Dear Ms. Wydra,

The Placer County Air Pollution Control District (District) has reviewed the Martis Valley West Parcel Specific Plan (MVWPSP) Project (Project) and associated Draft Environmental Impact Report (DEIR) prepared by Placer County (County). The proposed project is comprised of two components, the East and West Parcels. Current zoning allows 1,360 residential units and 6.6 acres of commercial uses within the East Parcel (the remainder of the East Parcel is designated Forest and zoned for Timberland Production). Under the proposed project, 775 acres of the West Parcel would be rezoned from Timberland Production to residential and commercial, allowing for 760 residential units and 6.6 acres of commercial uses. The remaining 345 acres would remain designated Forest. The 660-acres of the East Parcel currently zoned for development would be redesignated Forest, and a limited conservation easement would be placed over the entire 6,376 acres, or it will be sold fee simple to conservation groups. As a result, no development would occur on the East Parcel, and the total amount of development would be 600 residential units fewer than allowed under current zoning.

**Short-term. Construction-generated Emissions**

The DEIR has identified potentially significant air quality impacts from oxides of nitrogen (NOx) associated with short-term construction emissions generated by the Project (Impact 11-1: Short-term, construction-generated emissions of ROG, NOx, PM10, and PM2.5.) during the first phase of construction. Unmitigated emissions for NOx are estimated to exceed the District's recommended Construction threshold of 82 lbs/day. The County has chosen to use the District's Offsite Mitigation Program to reduce the construction emissions below the thresholds, therefore reducing the air quality impacts to a less-than-significant level. The District's Offsite Mitigation Program is a volunteer program to assist the lead agency in reducing the project related air pollutant emissions. The District commends the County for implementing the District's Offsite Program and for reducing air quality impacts during the construction phase.

The mitigation measure, however, does not disclose the potential cost to the developer and does not state the emission reduction requirement necessary to reduce the criteria pollutants below the thresholds. According to the modeling analysis prepared for the Project, after implementation of onsite mitigation, the applicant will need to reduce an additional 6 lbs/day for NOx, or 0.43 tons, for the first phase of construction activity, to reduce the construction impacts to a less-than-significant level. Based on the District's calculations, the offsite mitigation fee necessary to offset the first phase of the construction activity below thresholds will be \$7,789.00.

$$6 \text{ lbs/day} \times 144 \text{ days of construction activity} / 2000 \times \$18,030 = \$7,789$$

LA5-1

December 22, 2015  
Page 2 of 3

Furthermore, the mitigation measure falls short of identifying a mechanism for payment and verification by the District. The District recommends the County require the payment in full prior to the issuance of Improvement Plans and approval of the Dust Control Plan, to be approved by the District. The District recommends the Dust Control Plan be required as a Standard Condition of Approval, as follows:

LA5-1  
cont.

Prior to approval of Grading or Improvement Plans, on project sites greater than one acre, the applicant shall submit a Construction Emission / Dust Control Plan to the Placer County Air Pollution Control District. The applicant shall not break ground prior to receiving District approval of the Construction Emission / Dust Control Plan, and delivering that approval to the County.

**Long-term, Cumulatively Considerable Contribution of Operational Emissions**

The DEIR also identifies potential cumulatively considerable impacts resulting from the Project's long-term operational emissions. The DEIR proposes to mitigate the potential impact to a less-than-significant level by utilizing the District's Offsite Mitigation Program (MM11-6) to reduce operational-related emissions below the cumulative threshold. Again, the District commends the County's efforts to reduce air quality impacts associated with the long term operation of the Project.

The DEIR states that the intent of the DEIR, if certified, is to serve as the base environmental document for subsequent entitlement approvals within the West Parcel. The DEIR goes on to state that prior to approval of subsequent projects, the County *may* impose reasonable and necessary conditions to ensure that the project is in compliance with the MVWPSP and all applicable plans, ordinances, and regulations<sup>1</sup>. In an effort to reduce potentially significant air quality impacts associated with the operational phase of the Project, the DEIR requires, with implementation of MM11-6, that each subsequent entitlement application undergo additional environmental review to determine the level of mitigation needed to reduce criteria pollutants below thresholds. Specifically, MM11-6 requires that prior to final map approval, each project applicant is required to prepare an air quality modeling analysis to calculate and offset the operational emissions resulting from buildout of each subsequent development entitlement. Subsequent development projects which are found to be consistent with the MVWPSP would therefore still need to undergo additional environmental review. Given that the air quality analysis prepared for the Project identifies the project level emissions, the District recommends MM11-6 also identify the offsite mitigation applicable to each entitlement necessary to reduce criteria pollutant emissions below thresholds. MM11-6 would therefore serve as the mitigation necessary for each subsequent entitlement and would reduce costs associated with preparation of modeling analyses reduced review time by County and District staff.

LA5-2

The District also has concern regarding language within the mitigation measure, specifically a reduction for both ROG and NOx emissions below 10 lbs/day, whereas other parts of the measure describe NOx only. Additionally, one criterion provided within the measure states that a "credit" will be given for any on and offsite mitigation. A credit for proposed mitigation would need to be demonstrated by an established and recognized modeling analysis tool and should not be mistaken for a financial credit towards the offsite mitigation requirement. In order to address the language within the measure and to simplify the process as described above, the District recommends the following mitigation to assist with the implementation the MM 11-6, where the collection of the offsite fee per residential unit, as described below, would offset the

LA5-3

<sup>1</sup> Placer County Martis Valley West Parcel Specific Plan Draft EIR, page 2-4

December 22, 2015  
Page 3 of 3

proposed Project's cumulatively considerable emissions exceeding 10 lbs/day.

The Applicant shall pay \$121 per residential unit to the Placer County Air Pollution Control District's (PCAPCD) Offsite Mitigation program (total fee due is \$164,051) to offset 6.35 tons of ROG and 2.75 tons of NOx. The payment of the fee shall be apportioned based on the number of residential lots created per each small lot final map and shall be due prior to each recordation of each small lot final map.

LA5-3  
cont.

Thank you for allowing the District this opportunity to review the project proposal and associated environmental document. Please do not hesitate to contact me at 530.745.2333 or [agreen@placer.ca.gov](mailto:agreen@placer.ca.gov) if you have any questions.

Sincerely,



Angel Green  
Associate Planner  
Planning & Monitoring Section

ec: Yu-Shuo Chang, Planning & Monitoring Section Supervisor

PLACER COUNTY, MARTIS VALLEY WEST PARCEL SPECIFIC PLAN PROJECT, DEIR

LA5

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Placer County Air Pollution Control District  
Angel Green, Associate Planner  
December 22, 2015

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LA5-1

The comment reiterates information from Chapter 11, “Air Quality,” of the Draft EIR. The comment references PCAPCD’s Offsite Mitigation Program and commends the County for implementing the District’s Offsite Program and for reducing air quality impacts during the construction phase. The comment states that Mitigation Measure 11-1 does not disclose the potential cost to the developer and does not define the emissions reduction requirement necessary to reduce emissions of criteria pollutants below the thresholds. The comment’s calculation of a current cost estimate for fee payment is noted. As stated in the mitigation measure, the applicable fee rates change over time, and the actual amount to be paid would be determined in consultation with PCAPCD at the time of approval of the grading or improvement plans. The comment recommends that a Dust Control Plan be required as a Standard Condition of Approval. Chapter 11 acknowledges that a dust control plan must be submitted to and approved by PCAPCD before any construction activities when an area to be disturbed is greater than one acre, and if required by a Condition of Approval or discretionary permit (see page 11-10 of the Draft EIR). Such plans are required at the time of grading/improvement plan review by the County. To clarify, Mitigation Measure 11-1 will be modified to add that provision. The text of the Draft EIR is revised to read as follows:

**Mitigation Measure 11-1c: Submit Construction Emission/Dust Control Plan to PCAPCD**

Prior to approval of grading or improvement plans for subsequent phases of the MVWPSP, on project sites greater than one acre, the applicant shall submit a Construction Emission/Dust Control Plan to the Placer County Air Pollution Control District. Construction contractors shall not break ground prior to receiving District approval of the Construction Emission/Dust Control Plan, and delivering that approval to the County.

LA5-2

PCAPCD seeks clarification regarding the mitigation language and compliance process described in Mitigation Measure 11-6. Because the air quality analysis identifies the project-level emissions, PCAPCD recommends that Mitigation Measure 11-6 also identify the offsite mitigation applicable to each entitlement necessary to reduce criteria air pollutants below thresholds. PCAPCD provided the estimated offset fees for each residential unit based on project-specific modeling performed for the project and reported in the EIR. This would then serve as the mitigation necessary for each subsequent entitlement and would reduce costs associated with preparation of future modeling and analyses, and reduce review time by County and PCAPCD staff. As a result of this comment, additional language has been added to Mitigation Measure 11-6. Please see response to comment LA5-3 for the revised text.

LA5-3

PCAPCD notes that while Mitigation Measure 11-6 is meant to reduce both NO<sub>x</sub> and ROG to emissions below 10 lbs. per day, some portions of the mitigation only address NO<sub>x</sub> reductions. While it is true that onsite mitigation proposed only feasibly applies to NO<sub>x</sub> reductions, offsite measures outlined in MM 11-6 would address both NO<sub>x</sub> and ROG reductions. Additionally, PCAPCD mentions that use of the word “credit” in the third criterion of MM 11-6 could be mistaken for a financial credit towards the offsite mitigation requirement. This comment is noted. Pursuant to PCAPCD comments summarized above, and additional discussion with PCAPCD staff, Mitigation Measure 11-6 on pages 11-24 and 11-25 has been revised as follows:

~~■ The following measures shall be implemented to reduce long term operation-related emissions of ROG and NO<sub>x</sub>:~~

At the time a final map is submitted, the County, in coordination with PCAPCD, shall calculate the emissions associated with the land uses to be approved under that particular tentative map. Based on that calculation, the applicant shall do one or a combination of the following to ensure NO<sub>x</sub> emissions do not exceed 10 lbs per day. Once the 10 lbs per day has been reached, subsequent maps or phases must demonstrate no net increase in NO<sub>x</sub> emissions. The County shall consult with the PCAPCD to determine whether the measures proposed by the applicant would fully offset project emissions.

- ▲ ~~Reduce emissions on site by incorporating design features that would reduce NO<sub>x</sub> emissions. These features may include, but would not be limited to, energy conservation or “green” building features such as solar panels, energy efficient heating and cooling, energy star appliances, and/or measures that would reduce vehicle use, such as bike lockers and transit services;~~
- ▲ ~~Reduce emissions off site within the same region (i.e., Placer County) by participating in an offsite mitigation program coordinated by the PCAPCD and/or by funding energy efficiency measures (e.g., installation of insulation and/or dual pane windows in existing buildings), vehicle emission reduction measures (e.g., replace diesel school buses with natural gas buses), and/or trip reduction measures (e.g., bike lanes and/or neighborhood electric vehicle (NEV) lanes on streets that do not have them); and/or~~
- ▲ Participate in the PCAPCD Offsite Mitigation Program by paying fees based on the project’s contribution of pollutants (ROG and NO<sub>x</sub>), as follows, ~~adjusted by credit received for any applicable measures implemented by the project on or offsite.~~ The actual amount to be paid shall be determined, and satisfied per current California Air Resources Board guidelines, at the time of recordation of small lot tentative maps.
- The applicant shall pay \$219 per residential unit to the PCAPCD’s Offsite Mitigation Program (total fee due is \$166,144) to offset 6.35 tons of ROG and 2.75 tons of NO<sub>x</sub>. The payment of the fee shall be apportioned based on the number of residential lots created per each small lot final map and shall be due prior to each final map approval.



Town Council

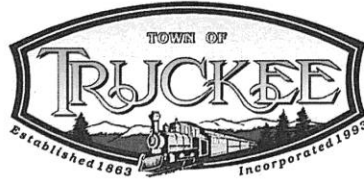
Joan deRyk Jones, Mayor

Morgan Goodwin, Vice Mayor

Carolyn Wallace Dee, Council Member

Patrick Flora, Council Member

Alicia Barr, Council Member



Dep

LA6

Tony Lashbrook,

Andy Morris,

Adam McGill,

John McLaughlin, Community Development Director

Kim Szczurek, Administrative Services Director

Judy Price, Town Clerk

Alex Terrazas, Assistant Town Manager

Daniel Wilkins, Public Works Director/Town Engineer

December 22, 2015

Ms. Stacy Wydra  
 Environmental Coordination Services  
 Community Development Resources Agency  
 3091 County Center Drive, Suite 190  
 Auburn, CA 95603

RE: Town of Truckee Comments on Martis Valley West Parcel Project Specific Plan Draft EIR

Dear Ms. Wydra:

Thank you for the opportunity to comment on the Draft EIR for the proposed Martis Valley West Parcel Project. The Town believes that there is merit in transferring development from the East Parcel to the West Parcel. The conservation of the East Parcel as open space and modification of development areas will help preserve the mountain character for locals and visitors alike. However, after reviewing the proposed plans, the Town believes that further consideration should be made to accommodate the workforce housing needs generated by this project. As noted in the Draft EIR:

**Impact 6-3: Provision of employee housing:**

The project is expected to generate between 66.58 and 122.68 new full-time equivalent (FTE) employees. Consistent with Placer County General Plan Housing Policy C-2, the project must provide housing or an in-lieu fee to support housing for half the total FTE (between 33.29 and 61.34). MVWPSP Policies LU-HS1 through LU-HS5 require the project to comply with this requirement, which is anticipated to be met by payment of the in-lieu fee. No mitigation is required.

**Cumulative Impact 6-6: Cumulative provision of employee housing:**

All proposed development projects in the Sierra Nevada region of Placer County are required to meet the 50 percent FTE employee housing requirement. In addition, the Town of Truckee (located in Nevada County) has established workforce housing requirements that, like Placer County, are intended to ensure an adequate supply of housing to meet the housing needs of all segments of the community. Article 7, Housing, of Title 18 of the Town of Truckee Development Code states that all commercial, industrial, institutional, recreational, residential resort, and other non-residential projects not identified as exempt shall include or provide workforce housing. Section 18.216.040 of Article 7 defines the ways in which workforce

LA6-1

10183 Truckee Airport Road, Truckee, CA 96161-3306

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Community Development: 530-582-7820 / Fax: 530-582-7889 / email: cdd@townoftruckee.com

Animal Services 530-582-7830 / Fax: 530-582-1103 / email: animalservices@townoftruckee.com

Police Department: 530-550-2323 / Fax: 530-582-7771 / email: policedepartment@townoftruckee.com

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Page 2

housing requirements may be met based on the FTE generated by projects in Truckee. Therefore, like the MVWPSP, cumulative projects (listed in Chapter 4, Table 4-1) with commercial and employee-generating uses, such as the Village at Squaw Valley Specific Plan must construct workforce housing or pay the in-lieu fee to ensure that sufficient employee housing is provided in the region.

Overall, the Town of Truckee is very concerned that the project will be relying solely on in-lieu fees to address the employee housing requirements, especially when no area has been identified in the Martis Valley area, or elsewhere, to utilize the fees for such housing. While the payment of in-lieu housing fees to fund workforce housing or rental subsidy programs at the discretion of Placer County may be considered an appropriate alternative, without a plan or location to accommodate employee housing, the DEIR fails to analyze the impacts associated with such development. Further, deferring the preparation of any housing plans to a future date (subsequent maps) does not allow the impacts to be analyzed in this EIR.

LA6-1  
cont.

Without a plan to accommodate housing for this project, these fees would not be specifically designated for use for housing-related projects within the vicinity of the project (Martis Valley or Sierra Nevada Region of Placer County), particularly since Hopkins Ranch, which was previously identified as land zoned for workforce housing within Martis Valley, was reportedly sold to the Tahoe Expedition Academy as a permanent location for the school's campus. Instead, the pressure for employee housing, which is created by the new jobs associated with the project, would either not be met or would be placed on the Town of Truckee.

Further, Cumulative Impact 6-6 references that the Town of Truckee workforce housing requirements are designed to meet the housing needs of "all segments of the community" as a means to addressing the employee housing needs of this project. However, the Town of Truckee is not within Placer County, nor will any of the in-lieu fees be collected by the Town of Truckee. Therefore, the Town of Truckee would not be able to utilize any funds toward mitigating workforce housing needs created by the proposed project and meeting the intent of the Town's workforce housing ordinance. The Town of Truckee has raised similar housing/in-lieu fee concerns regarding the Village at Squaw Valley Specific Plan Draft EIR.

LA6-2

The Town of Truckee sincerely appreciates the ability to review and comment on this important project as part of the environmental review process. We recognize the positive partnership the Town has with Placer County as we cooperatively work on the Truckee/North Tahoe Regional Workforce Housing Needs Study and we look forward to finding regional solutions to our common housing concerns.

LA6-3

We are committed to working closely with the County and the project team to clarify and address our concerns and will make key staff available to do so. Should you have any questions or need clarification related to any of our concerns, please contact me at 530.582.2901 or [tlashbrook@townoftruckee.com](mailto:tlashbrook@townoftruckee.com).

Sincerely,

  
Tony Lashbrook  
Town Manager

Cc:  
Truckee Town Council Members

---

**LA6**

**Town of Truckee**  
**Tony Lashbrook, Town Manager**  
**December 22, 2015**

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**LA6-1**

The comment provides an introductory statement that the Town believes there is merit in transferring development from the East Parcel to the West Parcel. Placer County will consider this information in its decision to approve the project.

The comment raises concerns regarding meeting the workforce housing needs generated by the project, particularly that the project proposes to rely solely on in-lieu fees to meet employee housing requirements without identifying the housing or development that would use such fees.

Placer County, the Town of Truckee, the Tahoe Prosperity Center and others are in the midst of a regional workforce housing assessment. In the Truckee/North Tahoe region there is a distinct and diverse difference between seasonal and year-around employees' workforce housing needs. Recognizing the array of needs and that a regional workforce housing assessment is underway, the applicant is no longer proposing a fee in lieu under the project's Workforce Housing Plan. Consistent with Placer County General Plan Policy C-2, a dedication of two parcels of land to Placer County within the MVWP is proposed. The lands would be restricted to workforce housing development.

The proposed employee housing site is located within the developable portion of the West Parcel, adjacent to the proposed transit shelter. This dedication of land is intended to provide housing at a critical project juncture point as well as to allow Placer County to adapt to regional needs over the course of time. The dedication of land would meet the requirements of Policy C-2.

The employee housing site could contain up to 21 units. Those units would be subtracted from the total proposed unit count of 760 for the proposed development; therefore, the total number of units allowed within the project site would not exceed 760. Therefore, the impacts of the proposed affordable housing land dedication have been fully analyzed in this EIR (because the total unit count and disturbed acreage would not change). See Chapter 2, "Revisions to the Draft EIR," of this Final EIR for additional discussions of this change to the project.

**LA6-2**

The comment raises concerns regarding Draft EIR Cumulative Impact 6-6, "Cumulative provision of employee housing," that the Town of Truckee is not in Placer County and will not receive nor be able to utilize any of the County's required in-lieu fees.

The cumulative employee housing impact (Cumulative Impact 6-6) addresses projects in the region, which include not only Martis Valley, but the Town of Truckee (in Nevada County) as well as the North Shore of Lake Tahoe and Squaw Valley (see the list of cumulative projects in Table 4-2 of the Draft EIR). The description of both Placer County's and Truckee's workforce housing requirements in the cumulative impact discussion is intended to address how the cumulative projects' employee housing requirements are met in Placer County and in Truckee. As the comment states, Placer County's acceptance of land would not be available to the Town of Truckee. Nonetheless, the provision of employee housing on the project site could have benefits for the Town by reducing demand for employee housing within its borders.

**LA6-3**

Placer County appreciates the Town of Truckee participating in review of the MVWPSP Draft EIR, and looks forward to continuing to work cooperatively on workforce housing needs in the region. The Town's comments related to workforce housing for the MVWPSP will be considered by the Placer County Planning Commission and Board of Supervisors during project deliberations.

**BOARD OF DIRECTORS**

Dennis E. Anderson  
 Jerry Gilmore  
 Brian Kent Smart  
 Ron Sweet  
 Nelson Van Gundy



BLAKE R. TRESAN, P.E.  
 General Manager  
 Chief Engineer

LA7

December 21, 2015

Placer County Community Development Resource Agency  
 Environmental Coordination Services  
 3091 County Center Drive, Suite 190  
 Auburn, CA 95603  
[cdraecs@placer.co.gov](mailto:cdraecs@placer.co.gov)

Placer County Community Development Resource Agency:

Thank you for the opportunity to provide comments in response to the Draft EIR for the Martis Valley West Parcel Specific Plan (MVWPSP). The Truckee Sanitary District (TSD) offers the following comments:

### Project Description

1. Section 3.4, "Infrastructure and Utilities," "Wastewater" (Page 3-27).
  - The MVWPSP is not located within a sanitary sewer collection district, and will require LAFCO approval for annexation into such a district. The existing contract between TSD and NCSD prohibits NCSD from collecting wastewater outside of the existing NCSD service area boundary. The proposed West Parcel development area lies outside of the existing NCSD service area boundary, and cannot be served under the existing TSD-NCSD contract. A new contract between NCSD and TSD must be executed for NCSD to provide wastewater collection services for the proposed project. LA7-1
  - Exhibit 3-12 does not show the location of sewer lines located within project streets and NCSD easements as indicated in the text. This text should either be corrected or the exhibit updated. LA7-2
  - The second paragraph indicates that a new sewer lift station would be located in the northeast portion of the West Parcel development area. No such lift station in this location is shown on any exhibit. Either the text should be corrected or Exhibit 3-12 updated. LA7-3
  - The three (3) sewer options outlined in the text and shown in Exhibit 3-13 appear to be inconsistent with the sewer requirements identified in Cumulative Mitigation LA7-4

- |   |                        |
|---|------------------------|
| <p>Measure 16-8a on Page 16-31, which indicates that regardless of the option, the existing 11,500 linear foot, 8-inch pipeline that crosses the Martis Valley along SR267 will need to be upsized to 16-inches.</p>  | <p>LA7-4<br/>cont.</p> |
| <p>2. <u>Exhibit 3-12, “Proposed Utility Connections” (Page 3-26).</u> The Exhibit should be revised to reflect the following:</p> <ul style="list-style-type: none"> <li>• It is very difficult to understand the sewer options as shown in the Exhibit since they are all shown in the same color. Do the options have overlapping infrastructure?</li> <li>• There is no NCSD sewer lift station in the location shown on the Exhibit.</li> <li>• The text on Page 3-27 indicates that the Exhibit shows 6-inch and 8-inch sewer lines located within the West Parcel area streets and NCSD utility easement. No such information is provided in the Exhibit.</li> </ul>   | <p>LA7-5</p>           |
| <p>3. <u>Exhibit 3-13, “MVWPSP – Offsite Sewer Connections” (Page 3-28).</u> The Exhibit should be revised to reflect the following:</p> <ul style="list-style-type: none"> <li>• For clarity, the Exhibit should show TSD’s and T-TSA’s sewer mains in different colors or otherwise indicate the transition point between the two agencies.</li> <li>• According to Cumulative Mitigation Measure 16-8a on Page 16-31, regardless of the sewer option used, the existing NCSD pipeline from the NCSD lift station to the TSD connection point will need to be upsized. This is not reflected in the Exhibit.</li> <li>• The Exhibit’s description for Sewer Option 2, as shown in blue, indicates an upgrade of an existing NCSD main. However, there is no existing NCSD sewer along a significant portion of where the blue line is drawn.</li> </ul> | <p>LA7-6</p>           |
| <p>4. <u>Table 3-7, “Expected Permits and Authorizations” (Page 3-35).</u> Table 3-7 should include under “Local”:</p> <ul style="list-style-type: none"> <li>• Agency: Truckee Sanitary District</li> <li>• Permit or Authorization: Contract for Service</li> <li>• Action Requiring Permit Approval or Review: New Contract for Service between NCSD and TSD required prior to LAFCO approval of the West Parcel development into NCSD service area</li> </ul>   | <p>LA7-7</p>           |
| <p><b>Utilities – Wastewater Treatment</b></p>  |                        |
| <p>5. <u>Section 16.1.2, “Wastewater Treatment” (Page 16-6).</u></p> <ul style="list-style-type: none"> <li>• This section should be entitled, “Wastewater Collection and Treatment.”</li> <li>• The first paragraph incorrectly identifies TSD as the “Tahoe Sanitation District.” The correct name is the “Truckee Sanitary District.”</li> </ul>   | <p>LA7-8</p>           |
| <p>6. <u>Section 16.1.2, “Northstar Community Services District” (Page 16-6).</u></p> <ul style="list-style-type: none"> <li>• The first paragraph references a “golf course siphon” and a “SR267 to TSD siphon.” The distinction between these two siphons is unclear and should be more clearly described.</li> <li>• In the first paragraph, please explain why there are two different ADWF and PWWF numbers cited, or revise the paragraph as appropriate. The ADWF and PWWF numbers cited seem to describe the same flows from NCSD.</li> </ul>   | <p>LA7-9</p>           |

- |  |   |                |
|--|---|----------------|
| <ul style="list-style-type: none"> <li>• In the first paragraph, please explain what it means for the siphon to have a capacity under PWWF. Does the pipeline have a different capacity under ADWF?</li> <li>• In the second paragraph, please revise the last sentence (ending with “LAFCO”) by adding “of annexation” after the word “approval” and adding the following clause at the end of the sentence: “which would require a new contract between NCSD and TSD.”</li> </ul>                            | <div style="border-left: 1px solid black; height: 100px; margin: 0 auto; width: 10px;"></div> | LA7-9<br>cont. |
| 7. <u>Section 16.1.2, “Truckee Sanitary District” (Page 16-8).</u>   |   |                |
| <ul style="list-style-type: none"> <li>• The statement, “New development is subject to connection fees for TSD services,” is incomplete. Please revise this to state the following: “New Development is subject to a range of requirements and fees as provided in the TSD Code. Fees include, but are not limited to, connection fees, monthly user fees, and surcharges in lieu of property taxes. These fees pay for capacity improvements, ongoing operation, and maintenance of TSD’s system.”</li> </ul> | <div style="border-left: 1px solid black; height: 100px; margin: 0 auto; width: 10px;"></div> | LA7-10         |
| <ul style="list-style-type: none"> <li>• This paragraph indicates that the Martis Valley Interceptor is “described above.” It is not clearly described in the preceding text.</li> </ul>   | <div style="border-left: 1px solid black; height: 100px; margin: 0 auto; width: 10px;"></div> | LA7-11         |
| <ul style="list-style-type: none"> <li>• This paragraph also references “NCSD 267” and the “TSD siphon.” Neither reference makes sense. The paragraph should be revised to clarify each reference.</li> </ul>  | <div style="border-left: 1px solid black; height: 100px; margin: 0 auto; width: 10px;"></div> | LA7-12         |
| <ul style="list-style-type: none"> <li>• The second to last sentence should be revised to state as follows: “The current capacity of the MVI is 2,113 gpm, meaning that flows beyond this estimated capacity could result in surcharges and/or spills.”</li> </ul>   | <div style="border-left: 1px solid black; height: 100px; margin: 0 auto; width: 10px;"></div> | LA7-13         |
| <ul style="list-style-type: none"> <li>• This paragraph states that TSD is in the process of updating its hydraulic model. TSD has completed its hydraulic model update and provided Ascent Environmental with capacity information which is described in other portions of the DEIR (e.g., Pages 16-23 and 16-30). TSD recommends the consultant utilize this information.</li> </ul>   | <div style="border-left: 1px solid black; height: 100px; margin: 0 auto; width: 10px;"></div> | LA7-14         |
| 8. <u>Section 16.3.2, Paragraph 3 (Page 16-17).</u> This paragraph references Table 16-8 as showing wastewater generation rates. However, Table 16-8 shows water demand information. This reference to a table should be revised or deleted.   |   |                |
| 9. <u>Impact 16-2, Paragraph 1 (Page 16-22).</u>   |   |                |
| <ul style="list-style-type: none"> <li>• This paragraph states that the capacity of the NCSD golf course siphon lines and 267 to TSD siphon lines are 2,100 and 2,550 gpm, respectively. However, this directly conflicts with Section 16.1.2, Page 16-6, which states the capacity of these pipelines to be 1,625 and 1,850 gpm, respectively. Please revise the text as appropriate to correct this discrepancy.</li> </ul>  | <div style="border-left: 1px solid black; height: 100px; margin: 0 auto; width: 10px;"></div> | LA7-16         |
| <ul style="list-style-type: none"> <li>• This paragraph states that the proposed project would generate peak wastewater flows of approximately 520 gpm. A table detailing how this number was arrived at should be provided.</li> </ul>  | <div style="border-left: 1px solid black; height: 100px; margin: 0 auto; width: 10px;"></div> | LA7-17         |
| 10. <u>Impact 16-2, Paragraph 2 (Page 16-23).</u>  |   |                |
| <ul style="list-style-type: none"> <li>• The first sentence should clarify that wastewater from the proposed project would be conveyed “to TSD and subsequently to the T-TSA wastewater treatment plant.” TSD is currently omitted from this sentence and should be included.</li> </ul>   | <div style="border-left: 1px solid black; height: 100px; margin: 0 auto; width: 10px;"></div> | LA7-18         |
| <ul style="list-style-type: none"> <li>• The paragraph references Exhibit 16-2 and states that it shows the sewer lines in project streets and NCSD easements. Exhibit 16-2 does not show the sewer lines.</li> </ul>  | <div style="border-left: 1px solid black; height: 100px; margin: 0 auto; width: 10px;"></div> | LA7-19         |

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|---|---------------------------------------|
| <p>This paragraph, Exhibit 16-2, or both, should be revised to match with accurate values.</p> <ul style="list-style-type: none"> <li>This paragraph indicates that a new sewer lift station would be located in the northeast portion of the West Parcel development area. No such lift station in this location is shown on any exhibit.</li> </ul>   | <p>LA7-19<br/>cont.</p> <p>LA7-20</p> |
| <p>11. <u>Impact 16-2, Paragraph 3 (Page 16-23).</u> The last sentence of this paragraph should be revised to state that the project applicant will obtain will-serve letters from NCSD and TSD before building permits are issued.</p>   | <p>LA7-21</p>                         |
| <p>12. <u>Impact 16-2, Paragraph 4 (Page 16-23).</u></p> <ul style="list-style-type: none"> <li>The first sentence indicates that components of the NCSD wastewater collection system used by the project are shown on Exhibit 16-2. Exhibit 16-2 does not show the components used by the project. It is unclear from this exhibit what existing NCSD facilities are being used. Additionally, this exhibit does not show the existing NCSD pump station or siphon pipeline across the Martis Valley, which the project would utilize. The exhibit should be updated or the text modified.</li> <li>The pipeline capacities indicated in the text of this paragraph do not agree with the values presented in Table 16-12. Either the text or the table should be corrected.</li> </ul>  | <p>LA7-22</p> <p>LA7-23</p>           |
| <p>13. <u>Table 16-12 (Page 16-23).</u> The existing PWWF capacity values shown for NCSD do not agree with those indicated in the supporting text. Please revise the table or text so that the values match and are accurate.</p>   | <p>LA7-24</p>                         |
| <p>14. <u>Impact 16-2, Paragraph 6 (Page 16-23).</u></p> <ul style="list-style-type: none"> <li>The second sentence of this paragraph indicates that the existing contract between TSD and NCSD can be amended to allow NCSD to collect wastewater from the proposed project and convey it through TSD's system. This is incorrect. The existing contract cannot be amended by TSD and NCSD because it is a three-party contract that includes the Trimont Land Company, which is not a party related to the proposed project. Therefore, this sentence should be revised and expanded to state as follows:</li> </ul> <p style="margin-left: 40px;">To provide wastewater collection and conveyance services to the MVWPSP, NCSD would enter into a new contract with TSD to include conveyance of wastewater from the West Parcel development area. The West Parcel development area is currently outside the NCSD service boundary, but proposed to be annexed, and a new service contract between NCSD and TSD would be required prior to annexation.</p> <ul style="list-style-type: none"> <li>The last sentence of this paragraph should be revised and expanded to state as follows:</li> </ul> <p style="margin-left: 40px;">The proposed project would also be required to comply with the terms and conditions of the new service contract between NCSD and TSD, which would include, among other things, payment of one-time fees for connection to the TSD system, as well as regular user fees and surcharges in lieu of property taxes for</p> | <p>LA7-25</p> <p>LA7-26</p>           |

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|--|-----------------------------|
| <p>ongoing operation and maintenance. Under the service contract between NCSD and TSD for service to the project area, NCSD would collect these fees and transfer them to TSD.</p>   | <p>LA7-26<br/>cont.</p>     |
| <p>15. <u>Impact 16-2, Paragraph 7 (Page 16-24).</u></p> <ul style="list-style-type: none"> <li>• Please revise the first sentence to clarify that the wastewater infrastructure and the proposed project will be designed and constructed in accordance with NCSD requirements and “consistent with a new TSD-NCSD service contract.”</li> <li>• Please revise the second sentence to state that the proposed project will be subject to “appropriate” fees, not “connection” fees.</li> </ul>  | <p>LA7-27</p> <p>LA7-28</p> |
| <p>16. <u>Cumulative Impact 16-8, Paragraph 1 (Pages 16-29 to -30).</u> This paragraph should clarify that the proposed project lies outside the current NCSD service area.</p>  | <p>LA7-29</p>               |
| <p>17. <u>Cumulative Impact 16-8, Paragraph 3 (Pages 16-30).</u> This paragraph states that the flows to the NCSD lift station could be up to 250 gpm, but elsewhere it states that flows from the proposed project alone would be up to 520 gpm. It is unclear what flows are being considered in the 250 gpm stated.</p>   | <p>LA7-30</p>               |
| <p>18. <u>Cumulative Impact 16-8, Paragraph 4 (Pages 16-30).</u></p> <ul style="list-style-type: none"> <li>• The list of cumulative projects that would contribute flow to the TSD system is not complete (notable missing elements include Schaffer’s Mill, TTAD Airport, Sierra Meadows). The incompleteness of this list should be clearly stated.</li> <li>• Any sewer flows from the Northstar Mountain Master Plan that come from locations outside of the existing NCSD service area were not considered in the design of the Martis Valley Interceptor.</li> <li>• The Brockway Campground is included in Paragraph 7 of this section (Page 16-31), but is not included in the cumulative project list in this section. Please revise this paragraph or Paragraph 7 as appropriate, or explain this discrepancy.</li> <li>• It is unclear what flow conditions are being represented in the last sentence. According to the hydraulic analysis performed by Farr West Engineering, at buildout, including the proposed project, and at peak wet weather conditions, flows will exceed the capacity of the TSD collection system resulting in possible sanitary sewer overflows at several manhole locations.</li> </ul> | <p>LA7-31</p>               |
| <p>19. <u>Cumulative Impact 16-8, Paragraph 5 (Page 16-30).</u> The third sentence, beginning, “In spite of fees . . .” does not make sense and should be clarified. Capacity constraints can not be mitigated through operations and maintenance.</p>   | <p>LA7-32</p>               |
| <p>20. <u>Cumulative Impact 16-8, Paragraph 6 (Pages 16-30 to -31).</u></p> <ul style="list-style-type: none"> <li>• As previously discussed in this letter, the existing contract between TSD and NCSD cannot be amended because it is a three-party contract that also includes the Trimont Land Company, which is not a party related to the proposed project. Therefore, this paragraph should be revised to include the following:</li> </ul>   | <p>LA7-33</p>               |



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| <p>To provide wastewater collection and conveyance services to the MVWPSP, NCSD would enter into a new contract with TSD to include conveyance of wastewater from the West Parcel development area. The West Parcel development area is currently outside the NCSD service boundary, but proposed to be annexed, and a new service contract between NCSD and TSD would be required prior to annexation. The proposed project would also be required to comply with the terms and conditions of the new service contract between NCSD and TSD, which would include, among other things, payment of one-time fees for connection to the TSD system, as well as regular user fees and surcharges in lieu of property taxes for ongoing operation and maintenance. Under the service contract between NCSD and TSD for service to the project area, NCSD would collect these fees and transfer them to TSD.</p>  | <div style="display: flex; align-items: center;"> <div style="border-left: 1px solid black; height: 100px; margin-right: 5px;"></div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">LA7-33<br/>cont.</div> </div> |
| <ul style="list-style-type: none"> <li>• TSD has provided the results of the capacity analysis. It shows that project-generated flows along with flows from other anticipated developments will exceed the capacity of the existing TSD MVI pipeline. The last sentence of this paragraph should be revised accordingly.</li> </ul>  | <div style="display: flex; align-items: center;"> <div style="border-left: 1px solid black; height: 50px; margin-right: 5px;"></div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">LA7-34</div> </div>            |
| <p>21. <u>Cumulative Mitigation Measure 16-8b, Paragraph 1 (Pages 16-31 to -32).</u></p> <ul style="list-style-type: none"> <li>• Please revise the fifth sentence to state as follows: “Prior to Improvement Plan approval, the project applicant shall provide evidence to payment to NCSD <i>and</i> TSD for fair share funding or show the construction of the improvements, to be determined in coordination with NCSD and TSD, which would provide sufficient capacity to the satisfaction of NCSD and TSD.”</li> <li>• To further ensure sufficient capacity, or appropriate improvements, within TSD’s system, please add the following after the list of improvement options at the end of this paragraph: “The developer of any project within the MVWPSP area will be required, as part of the Placer County Subsequent Conformity Review Process and/or tentative map approval process, to submit a will-serve letter from TSD prior to the issuance of any building permit.”</li> </ul> | <div style="display: flex; align-items: center;"> <div style="border-left: 1px solid black; height: 50px; margin-right: 5px;"></div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">LA7-35</div> </div>            |
| <p>22. <u>Cumulative Mitigation Measure 16-8a, First Bullet Point (Pages 16-31).</u> There appears to be text missing following “construction of.”</p>   | <div style="display: flex; align-items: center;"> <div style="border-left: 1px solid black; height: 50px; margin-right: 5px;"></div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">LA7-36</div> </div>            |
| <p>23. <u>Cumulative Mitigation Measure 16-8b, Paragraph 3, “Significance After Mitigation” (Pages 16-32).</u> Installation of a parallel pipeline to the existing TSD Martis Valley Interceptor is not possible without increasing the size of the easement granted to TSD by the underlying property owners. In general, the easement over the existing Martis Valley Interceptor is 15 feet wide. Additionally, replacement of the existing Martis Valley Interceptor or installation of a parallel pipeline would require temporary construction easements from the surrounding property owners.</p>   | <div style="display: flex; align-items: center;"> <div style="border-left: 1px solid black; height: 50px; margin-right: 5px;"></div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">LA7-37</div> </div>            |
| <p>24. <u>Cumulative Mitigation Measure 16-8b, Paragraph 2, “Significance After Mitigation” (Pages 16-32).</u> Please analyze whether the construction of improvements identified in Cumulative Mitigation Measures 16-8a and 16-8b would indirectly induce growth by removing obstacles to population growth.</p>   | <div style="display: flex; align-items: center;"> <div style="border-left: 1px solid black; height: 50px; margin-right: 5px;"></div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">LA7-38</div> </div>            |
| <p>24. <u>Cumulative Mitigation Measure 16-8b, Paragraph 2, “Significance After Mitigation” (Pages 16-32).</u> Please analyze whether the construction of improvements identified in Cumulative Mitigation Measures 16-8a and 16-8b would indirectly induce growth by removing obstacles to population growth.</p>   | <div style="display: flex; align-items: center;"> <div style="border-left: 1px solid black; height: 50px; margin-right: 5px;"></div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">LA7-39</div> </div>            |

Thank you for considering these comments. If you have any questions on this matter, please contact me at (530) 587-3804.

Sincerely,

A handwritten signature in black ink, appearing to read "Blake R. Tresan", with a long horizontal flourish extending to the right.

Blake Tresan  
General Manager/Chief Engineer  
Truckee Sanitary District

Cc: Meyes-Nave  
Northstar Community Services District  
Tahoe-Truckee Sanitation Agency

2557338.2

**LA7**

**Truckee Sanitary District**  
**Blake Tresan, General Manager/Chief Engineer**  
**December 21, 2015**

**LA7-1**

The comment points out that the MVWPSP is not located within a sanitary sewer district and that it would require Local Agency Formation Commission (LAFCO) approval for annexation into such a district. The comment also explains that the MVWPSP is located outside of the Northstar Community Services District (NCSD) service area boundary and cannot be served under the existing TSD-NCSD contract. This situation is acknowledged throughout the Draft EIR. Specifically, Chapter 3, "Project Description," of the Draft EIR (page 3-25), states:

After the approval of the Specific Plan and before the large lot final map is approved for recordation, the project applicant would apply for Local Agency Formation Commission (LAFCO) approval of annexation into the NCSD. NCSD is anticipated to provide water, sewer and wastewater treatment, fire and life safety, and some recreation services.

In addition, in Draft EIR Chapter 16, "Utilities," addresses this issue on page 16-6 and under Impact 16-2, "Increased demand for wastewater collection and conveyance services," (see page 16-23). Please see responses to comments below for additional detail in response to TSD comments related to annexation into the NCSD and the TSD-NCSD contract.

**LA7-2**

The comment requests that Exhibit 3-12 of the Draft EIR show the location of sewer lines located within project streets and NCSD easements. Exhibit 3-12 has been revised as shown on the following page. It should be noted that Exhibit 3-12 and 16-2 are the same; therefore, Exhibit 16-2 is also revised to reflect the locations of the internal sewer lines. Please also see Chapter 2, "Revisions to the Draft EIR," of this Final EIR.

**LA7-3**

The comment requests that Exhibit 3-12 of the Draft EIR show the location of a new sewer lift station that would be located in the northeast portion of the West Parcel. Exhibit 3-12 has been revised as shown in response to comment LA7-2, above. It should be noted that sewer lift location is in the southwest portion of the project site. The text on page 3-27 of the Draft EIR is revised to read as follows:

Project-generated wastewater would be collected with 6-inch to 8-inch sewer lines located within project streets and NCSD utility easements as shown in Exhibit 3-12. The collection system would flow by gravity to a new sewer lift station located in the ~~northeast-southwest~~ portion of the West Parcel development area at the topographical low point, near SR 267."

**LA7-4**

The comment requests that Exhibit 3-13 of the Draft EIR illustrate the requirement (per Cumulative Mitigation Measure 16-8a) to upsize the pipeline under SR 267 through the Martis Valley. Exhibit 3-13 is a preliminary exhibit to illustrate the offsite sewer connections. As such, it is adequate for the EIR project description.

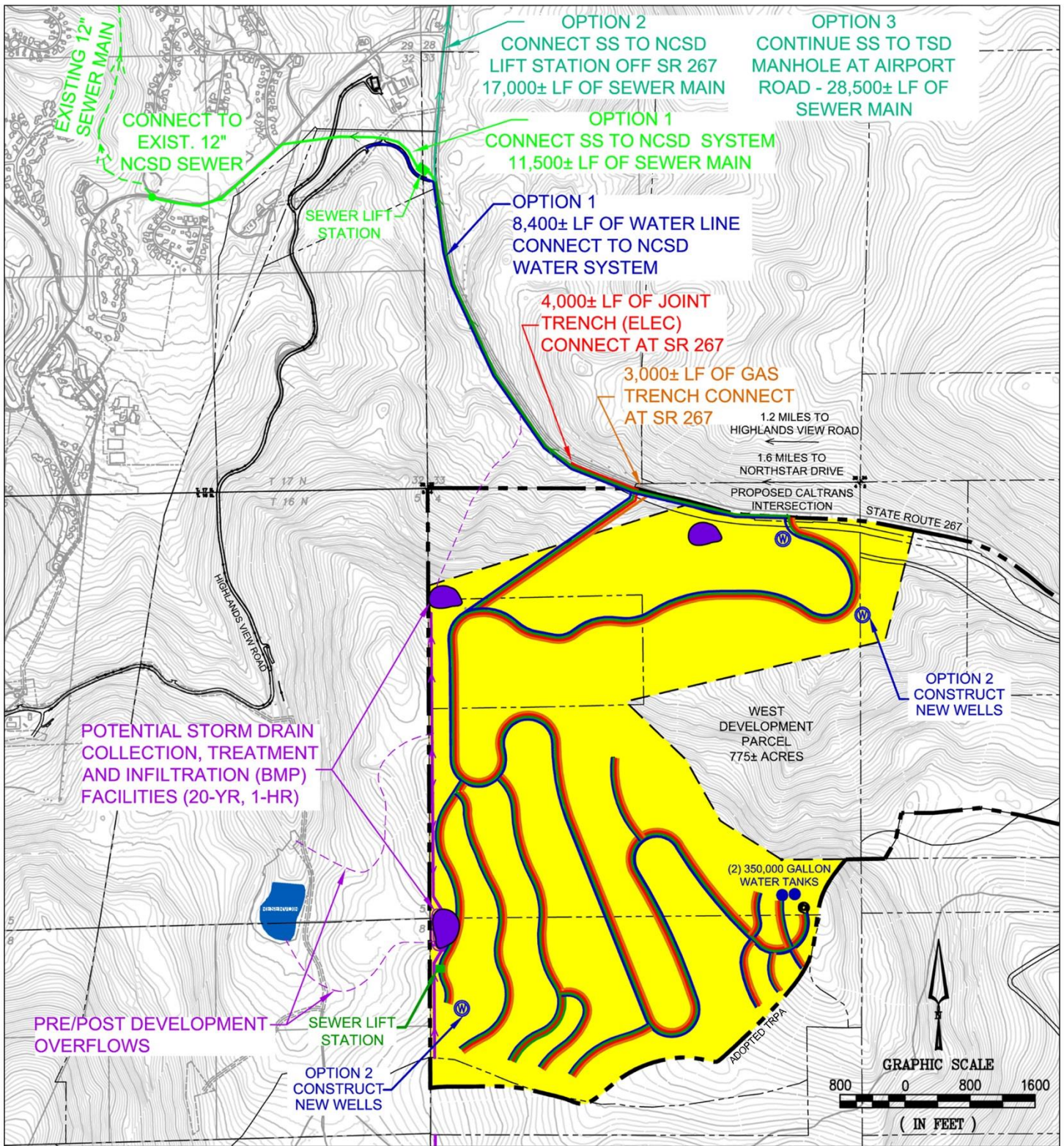
**LA7-5**

The comment recommends that Exhibit 3-12 of the Draft EIR be revised to reflect overlapping infrastructure, the location of a new sewer lift station, and sewer lines within project streets. Exhibit 3-12 has been revised as shown in response to comment LA7-2, above.

**LA7-6**

The comment recommends that Exhibit 3-13 of the Draft EIR be revised to differentiate between TSD's sewer mains and T-TSA's sewer mains to be consistent with Cumulative Mitigation Measure 16-8a to upsize the pipeline under SR 267 through the Martis Valley, and to correctly indicate where NCSD has existing mains or not (for Sewer Option 2). See response to comment LA7-4 above.





**LEGEND:**

---	MVWPSP WEST PARCEL	—	WATER LINE AND FACILITIES
---	STORM DRAIN FACILITIES & BMPs	---	ELECTRIC LINE AND FACILITIES
---	SEWER LINE AND FACILITIES	■	WEST PARCEL DEVELOPMENT AREA

Source: Welsh Hagen  
Associates in 2016

X14010007 01 062

LA7-7

The comment recommends that Table 3-7, “Expected Permits and Authorizations,” on page 3-35 of the Draft EIR include the Truckee Sanitary District’s contract for service. Table 3-7 on page 3-35 of the Draft EIR, under “Local” is revised as follows:

<b>Table 3-7 Expected Permits and Authorizations</b>		
<b>Agency</b>	<b>Permit/Authorization</b>	<b>Action Requiring Permit Approval or Review</b>
<b>Federal</b>		
U.S. Fish and Wildlife Service	Section 7 Consultation (through the USFS review process)	Potential impacts to a federally listed species or its habitat
U.S. Army Corps of Engineers	Section 404 Permit	Potential impacts to jurisdictional wetlands or waters
<b>State</b>		
California Department of Fish and Wildlife	Section 1602 Streambed Alteration Agreement	Potential disturbance to the bed or bank of jurisdictional waters
	2081 Incidental Take Permit	Potential impacts to a state-listed species
California Department of Forestry	Timber Harvest Plan Timber Conversion Permit	Harvesting of timber on private lands
California Board of Forestry (through CAL FIRE)	Approval of the immediate rezone from the Timberland Production Zone (TPZ)	Rezone lands from the Timberland Production Zone to SPL-MVWPSP
Lahontan Regional Water Quality Control Board	Section 401 Water Quality Certification	Potential impacts to state water quality; required when a federal permit is issued
	Board Order No. R6T-2007-0008 – Waiver of Waste Discharge Requirements Related to Timber Harvest and Vegetation Management Activities	Potential impacts to state water quality resulting from tree and vegetation removal activities
	Statewide Construction General Permit No. CAS000002 - Board Order No. WQO 2009-0009-DWQ	Discharges of stormwater runoff associated with construction activity involving land disturbance of 1 or more acres Stormwater Pollution Prevention Plan (SWPPP)
	Board Order No. R6T-2008-0023 – Renewed Waste Discharge Requirements and NPDES General Permit for Limited Threat Discharges to Surface Waters	Dewatering of excavations to surface waters (if overland discharge is not feasible)
California Department of Transportation (Caltrans)	Encroachment Permit	Construction, operation, and maintenance within, under, or over state highway rights-of-way
<b>Local</b>		
Placer County	Lead Agency under CEQA Legislative and Regulatory Authority for Project Entitlements	Requested changes in land uses and development entitlements for the MVWPSP area: Martis Valley Community Plan Land Use Diagram Amendment <u>Martis Valley Community Plan Text Amendment</u> MVWPSP adoption, including the adoption of the Development Standards and Design Guidelines by Ordinance Development Agreement Large Lot Tentative/Final Subdivision Maps Small Lot Tentative/Final Subdivision Maps Improvement Plans

**Table 3-7 Expected Permits and Authorizations**

Agency	Permit/Authorization	Action Requiring Permit Approval or Review
		Conditional Use Permits Minor Use Permits
Northern Sierra Air Quality Management District and Placer County Air Pollution Control District	Dust Control Plan Authority to Construct	Disturbance of more than 1 acre of topsoil Stationary sources
Local Agency Formation Commission (LAFCO)	Annexation Application	Annexation of the West Parcel development area into the NCSD service area
Northstar Community Services District	Annexation Application	Annexation of the West Parcel development area into the NCSD service area
<u>Truckee Sanitary District (TSD)</u>	<u>Contract for Service</u>	<u>New Contract for services between NCSD and TSD required following LAFCO approval of the annexation of the West Parcel development area into the NCSD service area</u>

Source: Compiled by Ascent Environmental, 2015.

LA7-8 As recommended by the comment, the heading of Section 16.1.2, “Wastewater Treatment,” will be revised. The text on page 16-6 of the Draft EIR will be revised as follows:

### 16.1.2 Wastewater Collection and Treatment

In addition, the first paragraph in Section 16.1.2 of the Draft EIR (page 16-6) is revised as follows:

Wastewater in the Martis Valley is treated by the Tahoe-Truckee Sanitation Agency (T-TSA) at its wastewater treatment facility in the Town of Truckee. Wastewater from the project site would be collected by the NCSD and conveyed to the treatment plant via sewer lines operated by NCSD and the Tahoe Sanitary Sanitation District (TSD). The facilities operated by each of these agencies are described in detail below.

LA7-9 The comment recommends that, under Section 16.1.2, “Northstar Community Services District,” on page 16-6 of the Draft EIR, a distinction be made between the “golf course siphon” and a “SR 267 to TSD siphon.” As requested in the comment, the descriptions of the “golf course siphon” and “SR 267 to TSD siphon” in the first paragraph under Section 16.1.2, “Northstar Community Services District,” on page 16-6 of the Draft EIR is revised as follows:

NCSD operates and maintains its wastewater collection system for the benefit of residential and commercial customers within its boundaries. NCSD maintains approximately 25 miles of sanitary sewer gravity mains, 560 manholes, 1,630 feet of force main, and 6.8 miles of inverted siphon main that extends from existing sewer lines located along Northstar Drive and runs through the Northstar golf course and along SR 267 to the airport access road. NCSD also maintains three sewer lift stations and two flow meters. As of February 2013, the District serves 1,724 residential sewer connections and 59 commercial sewer connections (NCSD 2013). The golf course siphon consists of parallel 8-inch and 12-inch pipelines that extend north from the existing sanitary sewer main on Northstar Drive to the NCSD lift



station on SR 267 (Exhibit 16-1). The average dry weather flow (ADWF) in the golf course siphon generated by existing development within the NCSD service boundaries is 0.6 million gallons per day (mgd) at 423 gallons per minute (gpm). The current peak wet weather flow (PWWF) in the golf course siphon is 0.82 mgd at 570 gpm. Under PWWF, the existing golf course siphon capacity is 1,625 gpm. At the SR 267 lift station, the golf course siphon discharges to the siphon pipelines that extend from the existing NCSD lift station on SR 267 along SR 267 to the Truckee Sanitary District (TSD) sewer line at Truckee Tahoe Airport Road (SR 267 to TSD siphon). The lift station includes two 225 gpm pumps. The SR 267 to TSD siphon consists of parallel 8-inch and 12-inch pipelines. The current ADWF in the SR 267 to the TSD siphon is 0.93 MGD at 648 gpm and the current PWWF is 1.14 mgd at 795 gpm. Under PWWF, the existing SR 267 to TSD siphon capacity is 1,850 gpm (NCSD 2015b).

The comment requests clarification on why there are two different ADWF and PWWF numbers cited in the paragraph under “Northstar Community Services District” on page 16-6 of the Draft EIR and on what it means for the siphon to have a capacity under PWWF and if the pipeline has a different capacity under ADWF. The two different ADWF and PWWF numbers refer to the capacities of the two different siphon lines, the golf course siphon and the SR 267 to TSD siphon. A clarification of the existing PWWF in the golf course siphon has been added to the text above.

The commenter requests clarification regarding what it means for the siphon to have a capacity under PWWF. As stated in the Draft EIR, the existing ADWF in the golf course siphon is 423 gpm, the existing PWWF in the golf course siphon is 570 gpm, and the capacity of the golf course siphon is 1,625 gpm, which is greater than the existing ADWF and the PWWF.

As requested in the comment, the last sentence of the second paragraph under Section 16.1.2, “Northstar Community Services District,” on page 16-6 of the Draft EIR is revised as follows:

NCSD operates a sewer collection system, but not treatment facilities (NCSD 2013). Wastewater is collected within the District, transmitted through a section of Truckee Sanitary District’s (TSD) collection system, then to the Tahoe-Truckee Sanitation Agency (T-TSA) Truckee River Interceptor (TRI) and ultimately to the T-TSA treatment facility for treatment. NCSD provides wastewater collection services to the Northstar Resort community but contracts with TSD for transfer of sewage via TSD’s facilities to the T-TSA treatment plant. The provision of wastewater collection service outside of the NCSD boundary would require approval of annexation from LAFCO, which would require a new contract between NCSD and TSD (Placer LAFCO 2014).

LA7-10

As requested in the comment, the paragraph under “Truckee Sanitary District” on page 16-8 of the Draft EIR is revised as follows:

TSD was initially formed in 1906 and is one of the oldest sanitary districts providing wastewater collection services in California (TSD 2015). TSD boundaries encompass approximately 39 square miles in Placer and Nevada Counties. TSD operates and maintains approximately 300 miles of gravity pipelines containing 3,927 manholes, 9 miles of pressure pipeline, 10 main lift stations, and 30 smaller lift stations. The collection system primarily services residential customers. Small businesses and restaurants contribute a small percentage of TSD’s total wastewater flow. Currently, there are approximately 10,800 residential and 650 commercial accounts discharging into TSD’s wastewater collection system. New development is subject to a range of requirements and fees as provided in the TSD Code. Fees include, but are not limited to, connection fees, monthly user fees, and surcharges in lieu of property taxes. These fees pay for capacity improvements, ongoing operation, and

~~maintenance of TSD's system connection fees for TSD services. As described above, the~~ The TSD sewer line, referred to as the Martis Valley Interceptor (MVI), begins at the outfall from the SR 267 to TSD siphon (see "Existing NCSD-TSD Connection" on Exhibit 16-1) ~~NCSD 267 to the TSD siphon at Truckee Tahoe Airport Road. The MVI conveys wastewater flows from NCSD to the TRI, located along the Truckee River. The existing peak hour dry weather flow (PDWF) is 950 gpm and existing PWWF is 1,375 gpm (Tresan, pers. comm., 2015b). The current capacity of the MVI is 2,113 gpm, meaning that flows beyond this estimated capacity could result in surcharges and/or spills peak weather flows beyond this amount could result in surcharges. TSD has recently completed hydraulic modeling of their wastewater conveyance system to identify the effects of future flows that result from buildout of the area served by TSD (Tresan, pers. comm. 2015c) is in the process of updating its hydraulic model to update existing and future capacity of its sewer lines (Bergeron, pers. comm., 2015). The results of this hydraulic modeling are included in the analysis of wastewater conveyance demand.~~

- LA7-11 In regard to clarification on the Martis Valley Interceptor (MVI) description, this sentence has been revised. Please see response to comment LA7-10 for this text edit.
- LA7-12 The comment requests clarification to references of the NCSD 267 and TSD siphon in Section 16.1.2, "Truckee Sanitary District," on page 16-8 of the Draft EIR. Please see responses to comments LA7-9 and LA7-10, above.
- LA7-13 The comment requests a text edit to the paragraph under "Truckee Sanitary District" on page 16-8 of the Draft EIR. Please see response to comment LA7-10, above, for this text edit.
- LA7-14 The comment states that TSD has updated its hydraulic model and that information from the update should be used in the Draft EIR. It should be noted that the results of the hydraulic model update were used for the impact analysis in the Draft EIR. References included under Impact 16-2 reflect updated conversations and information received from TSD (August and September 2015). The referenced text on page 16-8 cited earlier information from TSD (March 2015). To clarify the text, the last sentence of the first paragraph under Section 16.1.2, "Truckee Sanitary District," on page 16-8 of the Draft EIR is revised as shown in response to comment LA7-10, above.
- LA7-15 The comment requests clarification regarding reference to Table 16-8 for wastewater generation rates (see page 16-17 of the Draft EIR). The water demand factors were not used to estimate wastewater generation from the project. The second paragraph on page 16-17 under Section 16.3.2, "Wastewater," is revised to correct the reference and identify the location of the wastewater generation factors used as part of the analysis. Please see response to comment LA7-17 for a table displaying the generation rates. The text on page 16-17 is revised to read as follows:

Wastewater generated by the proposed project was calculated as part of the Sewer Capacity Analysis Technical Memorandum using ~~the wastewater generation rates in Table 16-8 and the~~ "probable mix" of units identified in Table 3-2 in Chapter 3, "Project Description."

- LA7-16 As requested by the commenter, the following changes are made to the third paragraph under Impact 16-2 on page 16-23 to reflect the existing capacity in the golf course siphon and SR 267 to TSD siphon lines:

Components of the NCSD wastewater collection system that would be used by the project are shown on Exhibit 16-2. Vital elements of NCSD's wastewater collection system are the parallel siphon lines, which collect wastewater flows from the entire



NCSD system and would receive wastewater flows from the West Parcel development area under Option 1 and Option 2. The golf course siphon lines have a total capacity of ~~2,400~~ 1,625 gpm. The SR 267 to TSD siphon lines have a total capacity of ~~2,550~~ 1,850 gpm. An independent evaluation of the capacity of the wastewater collection system and the potential impacts from MVWPSP development in combination with buildout in the NCSD service area was prepared for NCSD (NCSD 2015b). This analysis is discussed below under Cumulative Impact 16-8. The current dry and peak wet weather flows are described above in the Environmental Setting section and are shown in Table 16-12.

As shown in updated Table 16-12 (see response to comment LA7-23), in spite of a reduction in the capacity from what was included in Impact 16-2 in the Draft EIR, there would be sufficient remaining capacity in the golf course siphon line and the SR 267 to TSD siphon line to convey the projected wastewater flows from buildout of the MVWPSP. These revisions would not alter the analysis or conclusions of the EIR.

LA7-17

As requested by the commenter, the following new table is provided to include a summary of estimated wastewater generation for the proposed project. The table has been generated from information provided in the 2015 *Sewer Capacity Analysis – Martis Valley West*, prepared by Farr West Engineering for NCSD, and referenced in the Draft EIR.

**Table 16-15 Martis Valley West Parcel Specific Plan Unit and Wastewater Flow Summary**

<u>Land Use</u>	<u>ADWF Generation Factor (gpd/unit)</u>	<u>PWWF Generation Factor (gpd/unit)</u>	<u>Number of Proposed Units<sup>1</sup></u>	<u>ADWF Flows (gpd)</u>	<u>PWWF Flows (gpd)</u>	<u>ADWF Flows<sup>2</sup> (gpm)</u>	<u>PWWF Flows<sup>2</sup> (gpm)</u>
Single Family	<u>389</u>	<u>1,011</u>	<u>375</u>	<u>145,875</u>	<u>379,275</u>	<u>101</u>	<u>263</u>
Condominium	<u>339</u>	<u>881</u>	<u>265</u>	<u>89,835</u>	<u>233,571</u>	<u>62</u>	<u>162</u>
Townhouse	<u>339</u>	<u>881</u>	<u>120</u>	<u>40,680</u>	<u>105,768</u>	<u>28</u>	<u>74</u>
Commercial	<u>0.3 gpd/sq. ft.</u>	<u>0.96 gpd/sq. ft.</u>	<u>34,500</u>	<u>12,765</u>	<u>33,189</u>	<u>9</u>	<u>23</u>
Total	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>289,155</u>	<u>751,803</u>	<u>200</u>	<u>522</u>

<sup>1</sup> Demand calculations are based on the total number of probable units presented Chapter 3, "Project Description."

<sup>2</sup> A conversion factor of 1,440 minutes/day was used to convert gallons per day to gallons per minute.

<sup>3</sup> the modeling effort for the evaluation did not include the additional 22,000 square feet of homeowner amenities associated with the proposed project. The *Sewer Capacity Analysis Technical Memorandum* states that it is not likely that the additional wastewater generated by the homeowner amenities facilities would change the model results or any potential improvements to siphon lines that could be triggered by the MVWPSP development.

Source: NCSD 2015b, Compiled by Ascent Environmental 2015

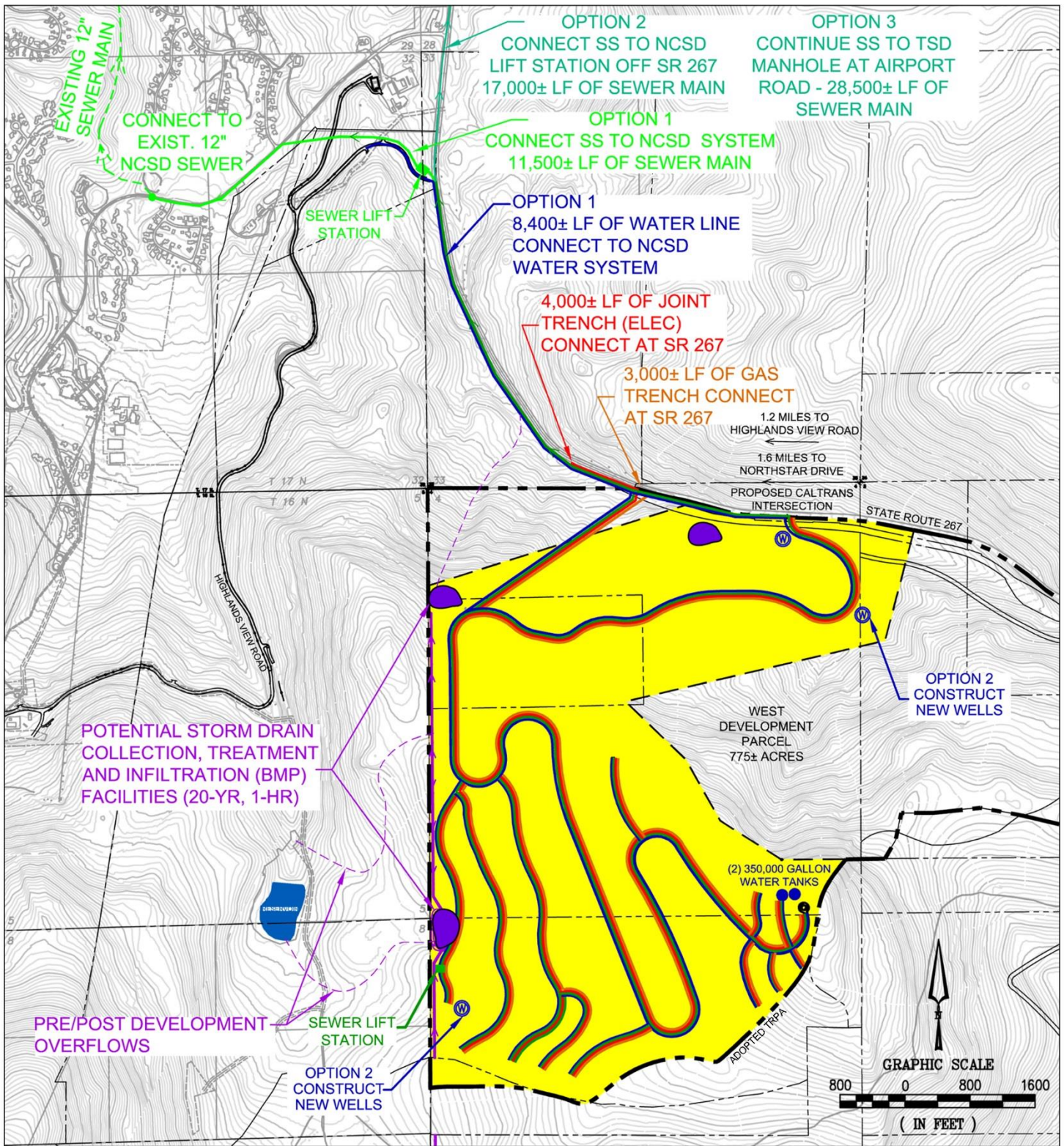
LA7-18

As noted by the commenter, the first paragraph under Impact 16-2 on page 16-22 of the Draft EIR is revised as follows:

As part of the MVWPSP, the West Parcel development area would be annexed to NCSD for wastewater collection and conveyance to TSD and subsequently to the T-TSA wastewater treatment plant. The Sewer Capacity Analysis Technical Memorandum (NCSD 2015b) concluded that future development under the MVWPSP would generate wastewater flows of 200 gpm under ADWF conditions and 520 gpm under PWWF conditions.

LA7-19

The comment requests that Exhibit 16-2 show the sewer lines in project streets and NCSD easements. Exhibit 16-2 has been revised to show these sewer lines as shown on the following page on Revised Exhibit 16-2.



**LEGEND:**

<span style="color: black;">---</span>	MVWPSP WEST PARCEL	<span style="color: blue;">—</span>	WATER LINE AND FACILITIES
<span style="color: purple;">---</span>	STORM DRAIN FACILITIES & BMPs	<span style="color: red;">---</span>	ELECTRIC LINE AND FACILITIES
<span style="color: green;">---</span>	SEWER LINE AND FACILITIES	<span style="background-color: yellow; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span>	WEST PARCEL DEVELOPMENT AREA

Source: Welsh Hagen Associates in 2016

X14010007 01 062

- LA7-20 The comment recommends that Exhibit 16-2 of the Draft EIR show the location of a new sewer lift station in the northeast portion of the West Parcel. Exhibit 16-2 has been revised as shown in response to comment LA7-19, above.
- LA7-21 The comment requests that TSD be added to the discussion of the will-serve letter from NCSD. However, NCSD has agreements with TSD and TTSA, and TSD would contract with NCSD. A separate will-serve letter would not be required.
- LA7-22 The comment requests that Exhibit 16-2 of the Draft EIR be updated to indicate the required upsizing of the pipeline under SR 267 through the Martis Valley and the NCSD pump station. The comment notes that the pipeline components do not line up with those indicated in Table 16-12. Exhibit 16-2 has been revised as shown in response to comment LA7-19 above.
- LA7-23 As noted by the commenter, the existing capacity of the golf course siphon lines and SR 267 to TSD siphon lines are corrected as identified in response to comment LA7-16. These revisions would not alter the analysis or conclusions of the EIR because it was determined that there was adequate capacity to serve the project under the original existing capacity numbers, which are lower than the corrected text. The following edits are made to Table 16-12 on page 16-23 to accurately reflect the existing PWWF capacity:

**Table 16-12 Existing NCSD and TSD Peak Wet Weather Flow Capacity**

	Existing PWWF	Existing PWWF Capacity	Remaining Existing Capacity	Proposed Project PWWF	Capacity adequate to serve proposed project?
NCSD Golf Course Siphon portion	570	<del>1,530</del> <u>1,625</u>	<del>960</del> <u>1,055</u>	520	Yes
NCSD SR 267 to TSD portion	795	1,850	1,055	520	Yes
TSD	1,375	2,113	738	520	Yes
Source: Tresan, pers. comm., 2015a, 2015b, 2015c; NCSD 2015b					
PWWF = Peak Wet Weather Flow					

- LA7-24 The comment recommends that either Table 16-12 or the associated text be revised to accurately reflect the existing capacity of the golf course siphon lines and SR 267 to TSD siphon lines. Table 16-12 has been revised as shown in response to comment LA7-23, above.
- LA7-25 The commenter clarifies that the TSD-NCSD contract cannot be amended, but rather a new contract would be necessary. The last paragraph on page 16-23 of the Draft EIR (under Impact 16-2) is revised as follows:

The existing agreement for conveyance via TSD infrastructure only allows for wastewater flows generated from development within the existing NCSD service boundary (TSD 2014). To provide wastewater collection and conveyance services to the MVWPSP, NCSD would enter into a new contract with TSD to include conveyance of wastewater from the West Parcel development area. The West Parcel development area is currently outside the NCSD service boundary, but proposed to be annexed, and a new service contract between NCSD and TSD would be required following annexation. ~~amend its contract with TSD to include collection and conveyance of wastewater from the West Parcel development area, which is currently outside the NCSD service boundary, but proposed to be annexed.~~ The proposed project would



also be required to comply with terms and conditions of the new service contract between NCSD and TSD, which would include, among other things, payment of one-time fees for connection to the TSD system, as well as regular user fees and surcharges in lieu of property taxes for ongoing operation and maintenance. Under the service contract between NCSD and TSD for service to the project area, NCSD would collect these fees and transfer them to TSD. ~~pay fees for connection to the TSD system that would go toward operating and maintenance costs.~~

- LA7-26 The commenter provides clarification related to a new service contract between NCSD and TSD. The last paragraph on page 16-23 of the Draft EIR (under Impact 16-2) is revised as shown in response to comment LA7-25, above.
- LA7-27 The commenter provides clarification related to wastewater infrastructure requirements. The last paragraph under Impact 16-2, on page 16-24 of the Draft EIR, is revised as follows:
- The wastewater infrastructure and the proposed project would be designed and constructed in accordance with NCSD requirements and consistent with a new NCSD-TSD service contract. The proposed project would minimize wastewater flows through implementation of water efficiency measures. The proposed project would also be subject to ~~connection~~ appropriate fees for TSD and T-TSA services, which would cover the operation and maintenance costs of the additional wastewater conveyance demand. Because of this and because the wastewater conveyance system has capacity to serve the projected peak wet weather flow from the proposed project, this would be a **less-than-significant** impact.
- LA7-28 The commenter provides clarification related to service fees. The last paragraph under Impact 16-2, on page 16-24 of the Draft EIR, is revised as shown in response to comment LA7-27, above.
- LA7-29 The comment requests clarification that the proposed project lies outside of the current NCSD service area. In response, the first paragraph under Cumulative Impact 16-8 on pages 16-29 and 16-30 of the Draft EIR is revised as follows:
- The geographic area that is considered for wastewater collection system includes the NCSD service boundary and the portion of the TSD wastewater collection lines extending between the NCSD outfall at Truckee Tahoe Airport Road and the T-TSA Truckee River Interceptor (TRI). For cumulative impacts on T-TSA wastewater conveyance, the area considered is the TRI between the TSD outfall pipeline and the wastewater treatment plant. As discussed under Impact 16-2, the West Parcel development area is currently outside the NCSD service boundary, but proposed to annexed, and a new service contract between NCSD and TSD would be required following annexation.
- LA7-30 The comment requests clarification on what flows to the NCSD lift station are being considered in the 250 gpm discussed in paragraph 3 on page 16-30 of the Draft EIR under Cumulative Impact 16-8. The last sentence of the third paragraph under Cumulative Impact 16-8 is revised as follows:
- Under existing conditions, NCSD is able to operate either of the 8-inch or 12-inch siphon lines to satisfy system demand. Under NCSD buildout conditions, the remaining available capacity of the siphon lines under PWWF is 443 gpm. The PWWF at buildout of the NCSD service area would require use of both siphon lines run in parallel and operation of both pumps at the lift station for short periods of time. With the addition of project-generated wastewater to the NCSD wastewater collection system at manhole 237, in combination with flows from existing and NCSD buildout

development, the golf course siphon section would not be able to meet the capacity requirements under PWWF conditions. Also, with the addition of MVWPSP flows, in combination with flows from existing and NCSD buildout development, the 267 to TSD siphon line section would essentially be at 100 percent capacity under PWWF conditions. The 267 lift station is also a key asset in the NCSD collection system. As equipped, the lift station has two 225 gpm pumps. Modeling simulations indicate that as flows increase with development, flows into the lift station will be up to 250 ~~520~~ gpm, exceeding the capacity of a single pump.

The corrected text represents higher project flows than were originally assessed in the Draft EIR, which concluded that there would be a cumulative impact on wastewater collection and conveyance demand. These revisions to the project's cumulative wastewater flows would not alter the analysis or conclusions of the EIR because it was determined that there was inadequate capacity in the pumps to serve the project and other cumulative projects, and Mitigation Measure 16-8a would be implemented to reduce this impact to a less-than-significant level. This mitigation is adequate because it would require improvements to be constructed to meet peak flows of 520 gpm.

LA7-31

The commenter provides input on the cumulative flows to the TSD system and notes that the list of cumulative projects included in the text that would contribute flow to the TSD system is not complete. The list included on page 16-30 is representative of future and incomplete (ongoing) projects. It is not intended to be an exhaustive list but rather to indicate examples of projects considered in the preliminary modeling, results of which are summarized later in the discussion. The comment requests a clarification of the different cumulative project lists between page 16-30 and 16-31. Because of the differences in the location of potential connection points to the sewer conveyance system from ongoing and future projects, different projects are discussed as potentially contributing flows at different points in the existing system. The comment states it is unclear what flow conditions are being represented in the last sentence. The last sentence summarizes the preliminary modeling results. More detailed information, separated by average dry weather flows and peak wet weather flows is provided in the paragraphs following the one cited by the comment.

The commenter requests clarification regarding the conclusion in Cumulative Impact 16-8 on page 16-30, because of the conclusions in the hydraulic analysis conducted by Farr West Engineering (NCSD 2015b). This paragraph is revised as follows to address the comment:

The TSD wastewater conveyance system in this area is currently able to serve existing wastewater flows during ADWF and PWWF. The preliminary results from modeling of project flows in addition to flows from buildout of other cumulative projects indicate that additional segments of the TSD system would reach capacity, and there could be overflow in some pipes. ~~In spite of fees that would be required to pay for the additional operation and maintenance costs generated by this additional demand. Although cumulative projects and the proposed project would be required to comply with terms and conditions of the applicable service contract, which would include, among other things, payment of one-time fees for connection to the TSD system, as well as regular user fees and surcharges in lieu of property taxes for ongoing operation and maintenance,~~ this would be a significant cumulative impact. Because it is not known at exactly what point during development of the project when the TSD system would reach capacity, additional flows from the proposed project could be added to the TSD system when it is near or at capacity, resulting in overflows prior to buildout of the project. The project would **make a considerable contribution** to the cumulative impact on wastewater conveyance in the TSD system.

- LA7-32 The comment asks for clarification of the term, “in spite of fees, in paragraph 5 on page 16-30 of the Draft EIR (under Cumulative Impact 16-8). The text of this paragraph is revised as shown in response to comment LA7-31, above.
- LA7-33 The commenter explains that the TSD-NCSD contract cannot be amended, but rather a new contract would be necessary. In response, the text of paragraph 6 on pages 16-30 and 16-31 of the Draft EIR (under Cumulative Impact 16-8) is revised as follows:
- The PDWF at buildout of the NCSD service area, the TSD service area served by the MVI, and MVWPSP is 2,743 gpm (Tresan, pers. comm., 2015c). The PWWF at buildout of the NCSD service area, the TSD service area served by the MVI, and MVWPSP is 3,842 gpm. Flows from buildout of the existing service area for the MVI and from the MVWPSP would result in approximately 5,500 linear feet of the MVI surcharging or overflowing. The existing agreement for conveyance via TSD infrastructure only allows for wastewater flows generated from development within the existing NCSD service boundary (TSD 2014). To provide wastewater collection and conveyance services to the MVWPSP, NCSD would enter into a new contract ~~amend its contract~~ with TSD to include collection and conveyance of wastewater from the West Parcel development area, ~~which is currently outside the NCSD service boundary, but proposed to be annexed.~~ The West Parcel development area is currently outside the NCSD service boundary, but proposed to be annexed, and a new service contract between NCSD and TSD would be required following annexation. The proposed project would also be required to comply with terms and conditions of the new service contract between NCSD and TSD, which would include, among other things, payment of one-time fees for connection to the TSD system, as well as regular user fees and surcharges in lieu of property taxes for ongoing operation and maintenance. Under the service contract between NCSD and TSD for service to the project area, NCSD would collect these fees and transfer them to TSD. ~~pay fees for connection to the TSD system that would go toward operating and maintenance costs. Until the evaluation of capacity in the TSD line on Truckee-Tahoe Airport Road and connecting to the TRI is completed, the ability of the line to accommodate project-generated wastewater is unknown.~~ Based on TSD’s capacity analysis, project-generated flows along with flows from other anticipated developments would exceed the capacity of the existing TSD MVI pipeline (Tresan, pers. comm., 2015c)
- LA7-34 The comment requests revision of the text in paragraph 6 on pages 16-30 and 16-31 of the Draft EIR (under Cumulative Impact 16-8) to reflect that the TSD capacity analysis was completed and that project-generated flows along with flows from other anticipated developments would exceed the capacity of the existing TSD MVI pipeline. In response, the text of paragraph 6 on pages 16-30 and 16-31 of the Draft EIR (under Cumulative Impact 16-8) is revised as shown in response to comment LA7-33, above.
- LA7-35 The comment requests revision of Cumulative Mitigation Measure 16-8b, on pages 16-31 and 16-32 of the Draft EIR, regarding payment of fair share funding to NCSD and TSD. In response, the first paragraph under Cumulative Mitigation Measure 16-8b is revised as follows:
- Prior to the Placer County Subsequent Conformity Review Process environmental determination for each development entitlement following Specific Plan approval, the project applicant shall coordinate with TSD to determine the wastewater conveyance demand at buildout of each proposed development entitlement and provide the County with a copy of the coordination. If TSD finds that project-generated peak wastewater flows exceed the capacity of the TSD line between the NCSD outfall at Truckee-Tahoe Airport Road and the TRI, NCSD and TSD shall develop plans for and construct improvements that would allow for conveyance of buildout wastewater

flows. The improvements shall be constructed to meet peak wet weather flows of 520 gpm, or flows determined by final design plans, in the sewer line from the NCSD outfall to the TRI. The plans shall identify the timing of the improvements, and that the capacity of the lines will be available when needed by project development. Prior to Improvement Plan approval, the project applicant shall provide evidence of payment to NCSD and TSD for fair share funding or show the construction of the improvements, to be determined in coordination with NCSD and TSD, which would provide sufficient capacity to the satisfaction of NCSD and TSD.

LA7-36 The comment requests the addition of the following language to Cumulative Mitigation Measure 16-8b, on page 16-32 of the Draft EIR, regarding submittal of a will-serve letter from TSD prior to issuance of building permits. As noted above in response to comment LA7-21, NCSD has separate agreements with TSD and TTSA. To reflect this, the following text is added to page 16-32 after the three bulleted items:

Improvements shall include:

- ▲ Providing onsite wastewater detention facilities, such as enlarged pipes, vaults, or tanks, such that conveyance can be timed to coincide with off-peak conditions when the TSD line has sufficient capacity; or
- ▲ Replacing the existing TSD line with a larger sewer line that increases capacity to serve future demand for wastewater conveyance; or
- ▲ Installing an additional line parallel to the existing TSD line that increases capacity to serve future demand for wastewater conveyance.

The developer of any project within the MVWPSP area shall be required, as part of the Placer County Subsequent Conformity Review Process and/or tentative map approval process, to submit a will-serve letter from NCSD prior to approval of improvement plans and/or prior to recordation of small lot final maps.

LA7-37 The comment requests clarification of text in the first bullet point under Cumulative Mitigation Measure 16-8a on page 16-31 of the Draft EIR. In response, this bullet point is revised as follows:

- ▲ With MVWPSP sewer flows into the golf course siphon at manhole 237 under Sewer Option 1, ~~construction of~~ and Sewer Option 2, upsize approximately 6,450 linear feet of the existing 8-inch siphon line through the golf course to 16-inch, and upsize approximately 11,500 linear feet of the existing 8-inch 267-TSD siphon line to 16-inch; and

LA7-38 The comment states that installation of a parallel pipeline to the existing TSD MVI is not possible without increasing the size of TSD's easement, which is currently 15 feet wide, and that construction would require temporary construction easements from surrounding property owners. In response, this mitigation measure is revised as follows:

#### **Cumulative Mitigation Measure 16-8b: Ensure sufficient capacity in TSD lines**

Prior to the Placer County Subsequent Conformity Review Process environmental determination for each development entitlement following Specific Plan approval, the project applicant shall coordinate with TSD to determine the wastewater conveyance demand at buildout of each proposed development entitlement and provide the County with a copy of the coordination. If TSD finds that project-generated peak wastewater flows exceed the capacity of the TSD line between the NCSD outfall at

Truckee-Tahoe Airport Road and the TRI, NCSD and TSD shall develop plans for and construct improvements that would allow for conveyance of buildout wastewater flows. The improvements shall be constructed to meet peak wet weather flows of 520 gpm, or flows determined by final design plans, in the sewer line from the NCSD outfall to the TRI. The plans shall identify the timing of the improvements, and that the capacity of the lines will be available when needed by project development. Prior to Improvement Plan approval, the project applicant shall provide evidence of payment to NCSD for fair share funding or show the construction of the improvements, to be determined in coordination with NCSD and TSD, which would provide sufficient capacity to the satisfaction of NCSD and TSD. Fair share funding or construction of the improvements by the project applicant shall also account for any additional permanent and/or temporary easements. Improvements shall include:

- ▲ Providing onsite wastewater detention facilities, such as enlarged pipes, vaults, or tanks, such that conveyance can be timed to coincide with off-peak conditions when the TSD line has sufficient capacity; or
- ▲ Replacing the existing TSD line with a larger sewer line that increases capacity to serve future demand for wastewater conveyance; or
- ▲ Installing an additional line parallel to the existing TSD line that increases capacity to serve future demand for wastewater conveyance.

LA7-39

The comment questions whether the improvements to wastewater conveyance facilities required by Cumulative Mitigation Measure 16-8b (page 16-32 of the Draft EIR) would indirectly induce growth. See Section 20.3 of the Draft EIR, “Growth-Inducing Impacts.” The project-related increase in demand for utilities, including wastewater service, is discussed therein. Specifically, this section states:

In particular, considering existing Northstar Community Services District (NCSD) service area wastewater flows, flows from buildout of the NCSD service area, and the addition of flows from the proposed MVWPSP development, the wastewater collection and conveyance system would be at capacity or would exceed capacity. Therefore, the MVWPSP would develop an agreement with NCSD for sewer system improvement plans and contribution of fair-share funding for their implementation. However, the MVWPSP would not include or fund the installation of utilities sized to accommodate growth beyond that which would occur due to growth that is already planned. Furthermore, the MVWPSP would not extend infrastructure (utilities or roadways) beyond the West Parcel, existing rights of way (e.g., SR 267, Highlands View Road, Northstar Drive, Truckee Tahoe Airport Road) or existing developed areas (Northstar Resort and Town of Truckee).



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**LA8**

December 18, 2015

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c/o Environmental Coordination Services

3091 County Center Drive, Suite 190

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**Re: Draft EIR for the Martis Valley West Parcel Specific Plan (MVWPSP)**

Dear Mr. Johnson and Ms. Wydra:

Thank you for the opportunity to review the DEIR for this Parcel Specific Plan.

We have reviewed the DEIR sections relevant to our comment letter dated December 5, 2014.

The Truckee Tahoe Airport District (TTAD or District) acknowledges the technical accuracy of the DEIR response to our comments, specifically those in Section 13 (Noise) and Land Use and Forest Resources (Section 5).

LA8-1

That being said, we respectfully make the following points:

- 1) TTAD is in the final stages of updating its Airport Master Plan. The plan includes planned modifications and additions to the airfield, terminal area, property acquisition, and instrument approach procedure. The principal proposed change to the airfield is the extension and widening of Runway 2-20. This modification is supported by a realignment and extension of the parallel taxiway that serves Runway 2-20. TTAD is proposing that two parcels of land be acquired. One property is in the approach to Runway 20. It would be acquired to ensure that inappropriate development did not occur in this sensitive area. The second parcel lies abeam the threshold for Runway 11. Aircraft-related noise is forecast to impact this parcel. We anticipate final adoption of the Mitigated Negative Declaration for the Master Plan and the Master Plan itself will trigger a change in the Truckee Tahoe Airport Land Use Compatibility Plan (TTALUCP). Per the current schedule, we expect the Truckee Tahoe Airport Land Use Commission (TTALUC) to consider the TTALUCP update in early 2016. While the TTALUCP change will not directly impact development proposals contemplated in the MVWPSP, we request that Placer County, the authors of the DEIR, and the proposed developers of the project(s) contemplated in the environmental analysis be aware of the anticipated TTALUCP change.
- 2) TTAD intends to pursue, with project developers, our request that Avigation Easements be required for all property sales in the Martis Valley West Development, in conjunction with specific noticing at purchase

LA8-2

LA8-3

connected, by more than a runway  
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that the property is near an airport and overflight is common. The District will also request that the proximity of the Airport and associated impacts be distributed in marketing materials for the development. We ask that our intention in this regard be noted in the MVWPSP Final Draft EIR.

LA8-3  
cont.

- 3) We also ask that the Final EIR reference the fact that Brockway Summit is a common, longstanding arrival and departure corridor for air traffic entering and departing the Airport to and from the south. Historically, aircraft arrive and depart over Brockway Summit, overflying the proposed development location. We note that aircraft may cross the ridgeline as low as 500 feet AGL or lower (above ground level) and still be compliant with Federal Aviation Regulations.

LA8-4

- 4) TTAD actively promotes our Fly Quiet Procedures, including our voluntary NO FLY curfew from 10 pm to 7 am daily. We limit hours of service and fuel to discourage night operations. However, while TTAD works hard to influence when and where aircraft fly, the Airport does not have authority to regulate where aircraft fly once airborne.

LA8-5

- 5) The Truckee Tahoe Airport is a federally obligated airport. We operate under the regulations and standards of the Federal Aviation Administration (FAA). FAA grants TTAD has received require our commitment to a detailed set of specific "Assurances". We must, at all times, be able to satisfy the Secretary of Transportation that the Truckee Tahoe Airport will continue to function as a public use airport in accordance with these assurances. FAA Grant Assurances can be found at [www.faa.airports/aip/grants assurances](http://www.faa.airports/aip/grants_assurances).

LA8-6

- 6) TTAD is firmly committed to our good neighbor policy and approach to relations with surrounding communities. One example is our volunteer Airport Community Advisory Team (ACAT). Established in 2005, ACAT works to develop solutions and strategies to minimize the impacts of the airport on surrounding communities. ACAT also works to generate ideas and communicate the public benefits that accrue locally and regionally from the presence and contributions of the Airport. Recommendations developed by the ACAT go directly to the District's Board of Directors on a regular basis.

LA8-7

- 7) As part of this comment letter, we have provided a copy of the Truckee Tahoe Airport Demand Drivers Study. This study investigates which aviation and non-aviation demand drivers as well as influencers correlate to changes in aviation activity at the Airport. (See Section 2.1 C, pg.27) Data analysis is augmented by surveys and interviews that explore how the Truckee Tahoe Airport District can influence these demand drivers. (Review Appendix D) This analysis includes factors that are under the control of the Airport District, can be influenced by the District, and those that are outside of TTAD control or influence. The online link to this study is as follows:

[https://ktrk-production-assets.s3.amazonaws.com/public\\_file/139/151023\\_TRK\\_Demand\\_Drivers\\_\\_2\\_.pdf](https://ktrk-production-assets.s3.amazonaws.com/public_file/139/151023_TRK_Demand_Drivers__2_.pdf)

LA8-8

Based on our experience with other residential developments in our immediate and surrounding region, it is a fact that land development marketing materials and media, particularly for higher end housing and/or second homes, typically promote the location and facilities of the Truckee Tahoe Airport. This Demand Drive Study essentially concludes that higher end home sales influence air traffic operations at the Truckee Tahoe Airport. (See Section 2.2 D & E, pg. 30) This overflight will not only affect new residents of the MVWPSP but also many existing Placer County and surrounding area residents. Could you please detail how the proposed project will address and mitigate noise and annoyance from additional aircraft overflight, and potential impacts on existing residents as well as new residents of the proposed project?

- 8) Finally, we would like to note that in 2007, the District participated with Placer County to purchase Waddell Ranch with the specific intent to avoid conflict with homes and overflight. Placer County's

LA8-9

connected, by more than a runway  
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participation at that time seems to imply that the County agreed that it is not beneficial to have homes under historic flight corridors. The District works very hard to avoid construction of new housing in close proximity to the Airport or within historic flight corridors. Does the County anticipate any conflict between potential new home owners on Brockway summit and aircraft noise generated from transitioning aircraft? If such a conflict is anticipated, how should the proposed project mitigate those impacts?

LA8-9  
cont.

Thank you in advance for your consideration of the requests and matters set forth in this letter.

Sincerely,



Kevin Smith  
General Manager

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**LA8**

Truckee Tahoe Airport District  
Kevin Smith, General Manager  
December 18, 2015

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- LA8-1 The comment notes the technical accuracy of the Draft EIR responses to the Truckee Tahoe Airport District's (TTAD's) December 5, 2014 scoping comment letter in Draft EIR Chapters 5 and 13. The comment is an introductory statement to more detailed comments in the letter.
- LA8-2 The comment explains that TTAD is updating its Airport Master Plan, which will trigger a change in the Truckee-Tahoe Airport Land Use Compatibility Plan (TTALUCP). The County and applicant are aware of this update and will monitor changes in the TTALUCP as consideration of MVWPSP approval is conducted and as future planning efforts proceed.
- As indicated in the comment, the proposed TTAD Master Plan would not directly affect either the West or East Parcels. As stated on page 18-13 of the Draft EIR, the West Parcel is not within the Compatibility Map of the adopted TTALUCP. The West Parcel is entirely outside of the Airport Influence Area Boundary, as shown on the Figure 2A of the adopted TTALUCP. The northwest boundary of the East Parcel does fall within the southeastern edge of the TTALUCP Zone E, which is defined as "Other Airport Environs." Residential development is allowed within this zone, but large gathering spaces, such as stadiums and concert halls are discouraged. The MVWPSP proposes conservation of the entire East Parcel in perpetuity, as well as reducing potential units by 600. This would not change under the proposed TTAD Master Plan. In addition, the MVWP supports one of the TTAD's main missions, preservation of open space, as outlined on their website, by placing the East Parcel in conservation. As TTAD states, "securing open space around the District, we remove the future impacts that the Airport may have had on developments."
- LA8-3 The TTAD intends to pursue aviation easements with project developers for all property sales in the MVWPSP, in conjunction with specific noticing at purchase regarding the property being in proximity to the Truckee-Tahoe Airport. As stated in response to comment LA8-2, no part of the West Parcel is located within the existing or future Airport Influence Boundary. As stated on page 35 of the TTAD Master Plan Mitigated Negative Declaration (MND), the 65 CNEL noise contour would be located entirely within the airport under the proposed update, with the exception of a small area north of the approach end of Runway 20, which is not in proximity to the West Parcel (Mead and Hunt 2015a). While only 65 CNEL contours are described in the MND, the West Parcel is not located within the 55 CNEL noise contour shown for the adopted TTALUCP (Foothill Airport Land Use Commission 2004). Because noise levels from the airport would be within adopted standards, there would not be a significant impact on project occupants associated with airplane noise. Occupants might hear planes flying overhead but such noise would be intermittent. For these reasons, an aviation easement is not needed or required for the project.
- Home buyers within the project site would be notified of the presence of the airport, as required by California Civil Code Sections 1103.4 and 1102.17. Under California Bureau of Real Estate procedures, during escrow of a property, a Natural Hazard Disclosure is executed by the buyer. This disclosure has a dedicated section that informs the buyer if any regional airport is located in the area, and of the possibility of associated noise.
- LA8-4 As noted by TTAD, Brockway Summit is a common arrival/departure corridor for air traffic entering/departing the Truckee-Tahoe Airport to/from the south. TTAD notes that aircraft may cross the ridgeline at as low as 500 feet above ground level or lower and still be compliant with Federal Aviation Administration (FAA) Regulations. As stated on page 13-14 of the Draft EIR (see Section 13.5.3), no part of the West Parcel, where all residential development would occur, is located within the existing or future Airport Influence Boundary.

As shown in Exhibit 3-4 on page 3-8 of the Draft EIR, Brockway Summit is located approximately 4,200 feet from the West Parcel where residences may be located. Further, TTAD implements Fly Quiet Procedures, including a voluntary no-fly curfew from 10:00 p.m. to 7:00 a.m. daily and limited hours of service to fuel to discourage night operations. See also responses to comment LA8-3.

- LA8-5 The County and applicant note TTAD's reference to its efforts to promote Fly Quiet Procedures, including the voluntary NO FLY curfew from 10 p.m. to 7 a.m. daily. It is further noted that TTAD limits the hours of service and fuel to discourage night operations, but that TTAD does not have authority to regulate where aircraft fly once they are airborne. Please also see response to comment LA8-3.
- LA8-6 The County and applicant acknowledge that the Truckee-Tahoe Airport is a federally obligated airport that operates under the regulations and standards of the FAA, and that it must be able to satisfy the FAA Grant Assurances. The comment does not indicate whether or how the project would affect the ability of TTAD to comply with the referenced assurances, or why such compliance is an environmental effect subject to CEQA.
- LA8-7 The County and applicant note TTAD's good neighbor policy and Airport Community Advisory Team (ACAT). The County will continue to work with and consider recommendations from the ACAT.
- LA8-8 The comment suggests that the MVWPSP would influence air traffic operations at the Truckee Tahoe Airport and requests analysis and mitigation to address additional aircraft overflight on existing and new residences. The TTAD Master Plan MND forecasts an increase in airport operations through 2025 (Table 1 on page 2). This information was used in the noise analysis for the TTAD Master Plan. According to the MND, all noise impacts associated with the proposed Master Plan would be less than significant except for construction noise, which could be mitigated to a less-than-significant level.
- The Demand Drivers Study referenced in the comment concludes that operation of the Truckee airport is in line with national trends and that the most important reason to use the airport is proximity to where passengers and pilots want to go, whether for recreational or residential reasons. According to the study, the lifestyle of the Truckee area is a primary driving factor for use of the Truckee airport, and people have the option to fly into the area and use the airport (Mead and Hunt 2015b).
- The comment does not provide evidence that the project would increase flights to the Truckee Airport beyond the levels evaluated in the TTAD Master Plan MND. As discussed in the "Research Methodology" of the report, while correlation can indicate possible interrelatedness of two variables, it does not imply causality. Rather, the results of the report help direct further research into what is driving demand for based aircraft at the airport. While the comment states that the study essentially concludes that that higher end home sales influence air traffic operations at the Truckee Tahoe Airport, it should be noted that the study itself states that correlation suggests (but does not outright confirm) that activity at the airport grows and declines with various external factors, including housing units sold. While the proposed project would bring a new population into the Martis Valley, and some of those people may choose to fly into the airport, as described in Impact 6-2 of the Draft EIR, the project would not increase the anticipated levels of growth anticipated in the Martis Valley Community Plan.
- LA8-9 The comment inquires whether the County anticipates conflicts between the new home owners at Brockway Summit and aircraft noise. As explained on page 13-14 of the Draft EIR, Section 13.5.3, "Issues Dismissed from Further Consideration," which is revised as shown in response to comment LA8-4, above, the County does not anticipate conflicts between

potential future homeowners and aircraft noise. The project would not locate any new residences on Brockway Summit; therefore, no such conflict is anticipated.

Regarding the acquisition of property by the airport or others to preclude noise conflicts, the MVWPSP would further this goal by making the East Parcel, which is more proximate to the airport than the West Parcel, available for acquisition/conservation in perpetuity and reducing by 600 units the total number of units that could be built in the Martis Valley.

Further, a portion of County property taxes collected within the TTAD boundaries are provided to TTAD. These funds pay for operations shortfalls, noise mitigation, capital projects, land acquisition and other budget items (TTAD 2016). Because it is based on property taxes, homeowners with more expensive properties will contribute more toward airport finances, including funding of noise mitigation.

The comments provided in this letter that relate to Tahoe-Truckee Airport operations and recommendations regarding the MVWPSP rather than the content, analysis, or conclusions in the Draft EIR will be taken into consideration by the Placer County Planning Commission and Board of Supervisors when making decisions regarding the project.